6.0 ALTERNATIVES

6.1 INTRODUCTION

This chapter evaluates alternatives to the proposed project and examines the potential environmental impacts associated with each alternative. Through comparison of these alternatives to the project, the relative environmental advantages and disadvantages of each are weighed and analyzed. The CEQA Guidelines require that the range of alternatives addressed in an EIR should be governed by a rule of reason. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6 [a]). When addressing feasibility, Section 15126.6 of the CEQA Guidelines states that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. The Guidelines state that the discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives, which are identified in Section 3.4 (Project Description, Objectives) of this EIR, or would be more costly. The Guidelines provide that an EIR need not consider alternatives whose implementation is remote or speculative, and finally that the analysis of effects of alternatives need not be presented in the same level of detail as the assessment of the project impacts.

Based on the CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the project, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives. The analysis in this EIR indicates that the following significant and unavoidable impacts would occur from implementation of the proposed project: Traffic (roadway impacts on Storke Avenue north of Hollister Avenue); Noise (short-term construction period impacts); and Air Quality (operational emission of criteria pollutants). Thus, the alternatives to the proposed project are examined to determine their potential to minimize or avoid the significant and unavoidable impacts that would result from implementation of the proposed project.

6.2 ALTERNATIVES TO THE PROPOSED PROJECT

The alternatives that are evaluated in this section include the following:

- *Alternative 1: South Parcel/Storke Whittier Development (formerly known as Project B)*—To avoid potential wetlands impacts on the North Parcel, this alternative (the "South Parcel" alternatives) assumes that 207 units of faculty housing would be constructed on the (North Campus) South Parcel, the North Parcel would remain undeveloped, and 151 units of Family

Student Housing would be developed on the Storke-Whittier Parcel (same as the proposed project).

Methodology for Selection of Alternative 1. When the Notice of Preparation for the proposed project was filed on July 25, 2003, the University identified a Project A (the proposed project) and a second Project B, involving the relocation of faculty housing from the North Parcel to the South Parcel and a reduction of the number of units of Family Student Housing. To simplify the analysis of the proposed project, the former Project B has become Alternative 3 (the "South Parcel/Storke Whittier Development Scenario"). Because this alternative scenario remains a viable option to meet project objectives while reducing potentially significant impacts, this alternative will be evaluated at an equal level of detail as the proposed project so that it can be selected by the decision-maker if the decision-maker determines that is preferable to the Project and other alternatives analyzed herein for environmental or other reasons.

- *Alternative 2: No Project: No Development*—Under this alternative, the proposed project would not be implemented. No residential buildings would be constructed, no open space improvements would occur, and no habitat improvements would occur.

  Methodology for Selection of Alternative 2. Section 15126.6(e)(1) of the CEQA Guidelines state that the specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

- *Alternative 3: North and South Parcel Development (Existing LRDP)*—This alternative assumes that the existing 1990 Long Range Development Plan, as amended in 1998, would remain in effect. Under this alternative, 147 units of faculty housing would be developed on the North Parcel, 122 units of faculty housing would be developed on the South Parcel, and 144 units of student housing would be developed on the Storke-Whittier site. No other open space improvements would occur, except as provided for in the 1990 LRDP (as amended). This alternative provides for a plan-to-plan comparison of the 1990 LRDP (as amended) and the proposed LRDP amendment, as articulated in Section 15126.6(e)(3)(A) of the CEQA Guidelines.

  Methodology for Selection of Alternative 3. Section 15126.6(e)(3)(A) of the CEQA Guidelines states that when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative will be the continuation of the existing plan, policy, or operation into the future. Therefore, under Alternative 3, the impacts of the proposed LRDP amendment (e.g., to change land use designations on the North and West Campuses) are compared to the impacts that would occur under the existing plan (e.g., the 1990 LRDP, as amended in 1998).

- *Alternative 4: Maximum Housing Development*—Under this alternative, the number of housing units would be maximized to assist the University in meeting long-term housing needs: 236 units of faculty housing would be developed on the North Parcel, 207 units of faculty

housing would be developed on the South Parcel, and 151 units of Family Student Housing would be developed on the Storke-Whittier site.

Methodology for Selection of Alternative 4. In 1994 the University purchased the North Campus with the intent of providing faculty and student housing. This alternative is in response to the identified project objective to "maximize the ability of the North Campus to meet identified University housing needs."

- *Alternative 5: Off-Site Alternative*—Under this alternative, the faculty and family student housing would be developed somewhere else.

  Methodology for Selection of Alternative 5. To reduce potential impact of the proposed project, this alternative considers whether development of the proposed project at an alternative site would reduce impacts.

6.3 ALTERNATIVES NOT CONSIDERED IN THIS EIR

During the scoping process, other alternatives were also considered, but were found to be infeasible, as described in the following sections.

6.3.1 Residential Development on the UCSB Main or Storke Campus

The 1990 Long Range Development Plan identified a range of building sites on the USCB Main, Storke, and West Campuses, and proposed a range of land uses for those building sites. The sites were identified in the LRDP on Figure 12 (Main Campus Plan, refer to Figure 4.1-1), Figure 23 (Storke Campus Plan, refer to Figure 4.1-3) and Figure 24 (West Campus Plan, refer to Figure 4.1-4), and also listed in Table 13. In conjunction with the subsequent amendments of the LRDP, Table 13 has been updated as relevant.

Per the land use provisions of the LRDP, certain areas of the University have been designated for academic programs, while others, generally at the periphery of the Main Campus, and sites on the Storke and West Campuses, have been identified for support functions, such as housing. No remaining sites on the Main Campus are identified for housing, although housing support functions are identified for sites 33 and 38 (which will be occupied by the Residential Life Resources Center). Of the remaining sites identified for academic functions, these sites range from 4,300 gross square feet to 318,000 gsf (7.3 acres). On the Storke Campus, the only suitable site for housing is already proposed for such purpose as the site for the San Clemente student housing project, and thus is unavailable. As the faculty housing project would occupy approximately 23 acres and the family student housing project would occupy approximately 13 acres, there are no sites identified in the LRDP on the Main Campus or Storke Campus that could accommodate either residential project. Therefore, an alternative that would build faculty and/or family student housing on the UCSB Main or Storke Campuses is considered infeasible and is not analyzed in this EIR.

6.3.2 Increased Building Heights

The proposed project would limit the height of residential structures on the North Parcel and the Storke-Whittier Parcel to 35 feet. If the height of those structures was increased, the amount of land area occupied by residential structures (or footprint) could be reduced. For example, if the height of structures were doubled to 70 feet, then the footprint of those structures would be significantly reduced. However, the overall footprint of residential development would not necessarily be reduced in half, as the need for roads and parking areas would remain the same. Building heights greater than 35 feet would be inconsistent with the height limits imposed by the 1990 LRDP for the West Campus, which were extended to the North Campus in conjunction with the 1998 LRDP amendment (which permitted student residences to reach 45 reach). Increased building heights would also result in buildings that are out-of-scale with adjacent structures (including single family homes north of the North Parcel and two-story residences at the West Campus Family Student Housing), and would, therefore, be inconsistent with LRDP Policy 30251.5, which specifies that new structures on the campus shall be in general conformance with the scale and character of surrounding development. Further, taller buildings would have the potential to increase impacts associated with loss of scenic vistas. Therefore, an alternative that would increase building heights is considered infeasible and is not analyzed in this EIR.

6.3.3 Reduced Density

To reduce direct impacts to Biological Resources, the footprint of residential development could be decreased, by reducing the density of residential development. The proposed faculty housing on the North Parcel would result in direct loss of 2.45 acres of wetlands and riparian areas. To eliminate direct loss of wetlands and retain a 100-foot buffer around them, an analysis of the development potential of the North Parcel was undertaken. This analysis concluded that only an estimated 16 units of faculty housing could be developed within those constraints. One of the primary reasons is that the location of existing wetlands limits access to those portions of the site where no wetlands are located. The development of only 16 units of faculty housing would be inconsistent with the project objectives to provide additional on-campus faculty housing to meet long-term demand and assist the University in the recruitment and retention of faculty, and to effectively utilize the North Campus property as a viable resource to meet identified University housing needs. Therefore, an alternative that reduces the footprint of development on the North Parcel to eliminate direct impacts to wetlands is considered infeasible and is not analyzed in this EIR. Further, the alternative of avoiding development on the North Campus (which is substantially equivalent to developing only 16 units on the North Campus) for the purpose of mitigating impacts on wetlands is already analyzed in the No Project Alternative (Alternative 2) and the South Parcel/Stoke-Whittier Parcel Development (Alternative 1). Alternative 3 (*North and South Parcel Development—Existing LRDP*) proposes the development of 147 units of faculty housing on the North Parcel, per the land use designation in the existing LRDP (as amended in 1998), and thus also serves as a reduced density alternative for North Parcel for the purposes of this EIR.

Finally, it should be noted that as originally proposed, the Sierra Madre Family Student Housing project would have included development on the northern Storke-Whittier Parcel, west of the parking lot for the Ocean Meadows Golf Course, which would have resulted in the direct loss of approximately 0.51 acres of wetlands at that location. During design development, the layout of the proposed Family Student Housing project was revised to eliminate all development on the parcel west of the golf course parking lot, thereby eliminating the loss of wetlands at the northern Storke-Whittier Parcel.

6.4 ANALYSIS OF ALTERNATIVES TO THE PROPOSED PROJECT

This section provides an analysis of the environmental impacts of each of the project alternatives discussed in Section 6.2, including a comparison of the potential impacts of the alternative to the proposed project.

Five alternatives are analyzed in this section, including the No Project alternative. The South Parcel/Storke-Whittier Development Alternative (No. 1) analyzes avoiding North Parcel development entirely to reduce impacts to wetlands on the North Parcel. The No Project Alternative (No. 2) results in no new development and is analyzed to identify the circumstances that would result if the project does not proceed. The North Parcel/South Parcel Alternative (No. 3) provides for the continued implementation of the existing 1990 LRDP (as amended) with a reduced amount of development on the North Parcel, and is analyzed to allow The Regents to compare the impacts of approving the proposed amendment of the LRDP with the impacts of proceeding with development under the existing LRDP. Alternative 4 considers an alternative to maximize the housing potential of the North Campus, and Alternative 5 analyzes an off-site alternative for residential development.

To provide a consistent basis for comparison, it is assumed that for each of the alternatives, Mitigation Measures identified for the proposed project would be implemented as applicable for each of the Alternatives.

6.4.1 Alternative 1: South Parcel/Storke-Whittier Development

6.4.1.1 Description

To avoid potential impacts to wetlands on the North Parcel, this alternative assumes that the North Parcel would be retained as undeveloped property, and that 207 units of faculty housing would be development on the South Parcel (of the North Campus), and 151 units of family student housing would be developed on the Storke-Whittier Parcel. This alternative would not implement the concepts articulated in Joint Proposal (including the resultant Open Space Plan), as the South Parcel would be utilized for development rather than open space and recreational purposes. Habitat restoration or coastal access improvements would be limited to those provided for in the COPR Management Plan.

6.4.1.2 LRDP Amendment

Under this alternative, the existing LRDP, which currently permits 122 units of faculty housing on the South Parcel, would be amended to permit the development of 207 units of faculty housing and to designate the North Parcel as open space. Other proposed modifications to the LRDP would be similar to the proposed project, as summarized in Table 6-1.

Table 6-1.
Alternative 1 LRDP Amendments

Campus Area	Current LRDP Designation	Proposed LRDP Designation
North Campus		
North Parcel	Up to 147 units of faculty housing	26 acres of Open Space
South Parcel	Up to 122 units of faculty housing	207 units of faculty housing and 28.7 acres of Open Space
Storke-Whittier Parcel	Up to 144 units of family student housing	Up to 151 units of family student housing
Ellwood Marine Terminal	17.5 acres of oil storage facility to be converted to Open Space in 2016 following lease expiration	No change from current LRDP designation
West Campus		
West Campus Mesa Future Development Area	100 units of faculty housing	50 units of faculty housing
West Campus Mesa—Garden Area and Northern Slough Finger	25.3 acres of recreation and other use	No change
Coal Oil Point	Replace Cliff House	No change from current LRDP designation
COPR	125.4 acres of existing Reserve, plus 40.0 acre expansion site, designated as Environmentally Sensitive Habitat Areas and Natural Reserve	Designate 165.4 acres as Natural Reserve
West Campus Bluffs	37.2 acres of Open Space, pending approval of faculty housing elsewhere	37.2 acres of Open Space
Faculty Housing	100 units	50 units
Orafalea Children's Center	10,000 gsf expansion	No change
Total Change in Housing	513 units of Faculty and Family Student Housing	408 units of Faculty and Family Student Housing
Total Change in Open Space and Natural Area	202.6 acres of Open Space and Natural Reserve	283 acres of Open Space and Natural Reserve

6.4.1.3 Specific Projects

Under this alternative, two sites would be developed: (1) the North Campus Faculty Housing (on the South Parcel, instead of the North Parcel) and (2) the Sierra Madre Family Student Housing on the Storke-Whittier Parcel.

6.4.1.4 South Parcel Faculty Housing

This alternative would provide 207 units of housing on the South Parcel of the North Campus (south and west of the Ocean Meadows Golf Course), in a mix of detached single family, duplex and courtyard housing. (Refer to Figure 6-1.).

Units would be two, three, or four bedrooms and there would be a mix of two and three story units. Although the homes would vary in size, the total amount of development would be approximately 1,300 gross square feet per unit. The complex would also include a community recreation facility in a common building with a swimming pool. None of the structures would exceed 35 feet in height. The amount of built space would total approximately 342,250 gross square feet, including garages and the community center and pool.

Vehicular access to the site would be provided via Storke Road (near the intersection with El Colegio, along the route of the existing Venoco Access Road, with a bridge (and culvert) over Devereux Creek. Internal roads and alleyways would be narrow in width to serve as traffic calming measures. A total of approximately 485 spaces of off-street parking would be provided, with 300 spaces for the duplex housing, 92 spaces for the townhome housing, and 18 spaces for the detached family housing. In addition, approximately 75 spaces of on-street parking would be available for visitors.

The twin 24-inch drainage pipes and concrete barrier over Devereux Creek that separates the creek from the Devereux Slough (at the southern edge of the Ocean Meadows Golf Course) would be replaced with a 42 x 60-inch ~~box~~ culvert/bridge to increase the discharge capacity of the creek.

Development would occur on approximately 40 of the 68.7 acres on the South Parcel (as the site layout would be spread out to avoid existing wetland areas). Existing informal trails around the perimeter of the site would be maintained, linking to the Window Trail along the western boundary of the North Campus. To minimize runoff from impervious surfaces, pervious areas, vegetated filter strips, porous pavements would be utilized where appropriate. Surface runoff would be conveyed via surface channels and cobbled swales into bioswales landscaped with native wetland plant species. Sustainable design practices would be implemented using green resource and energy conservation methods. 100-foot buffers would be provided around all wetlands and drainage channels and no construction would occur within those buffers.

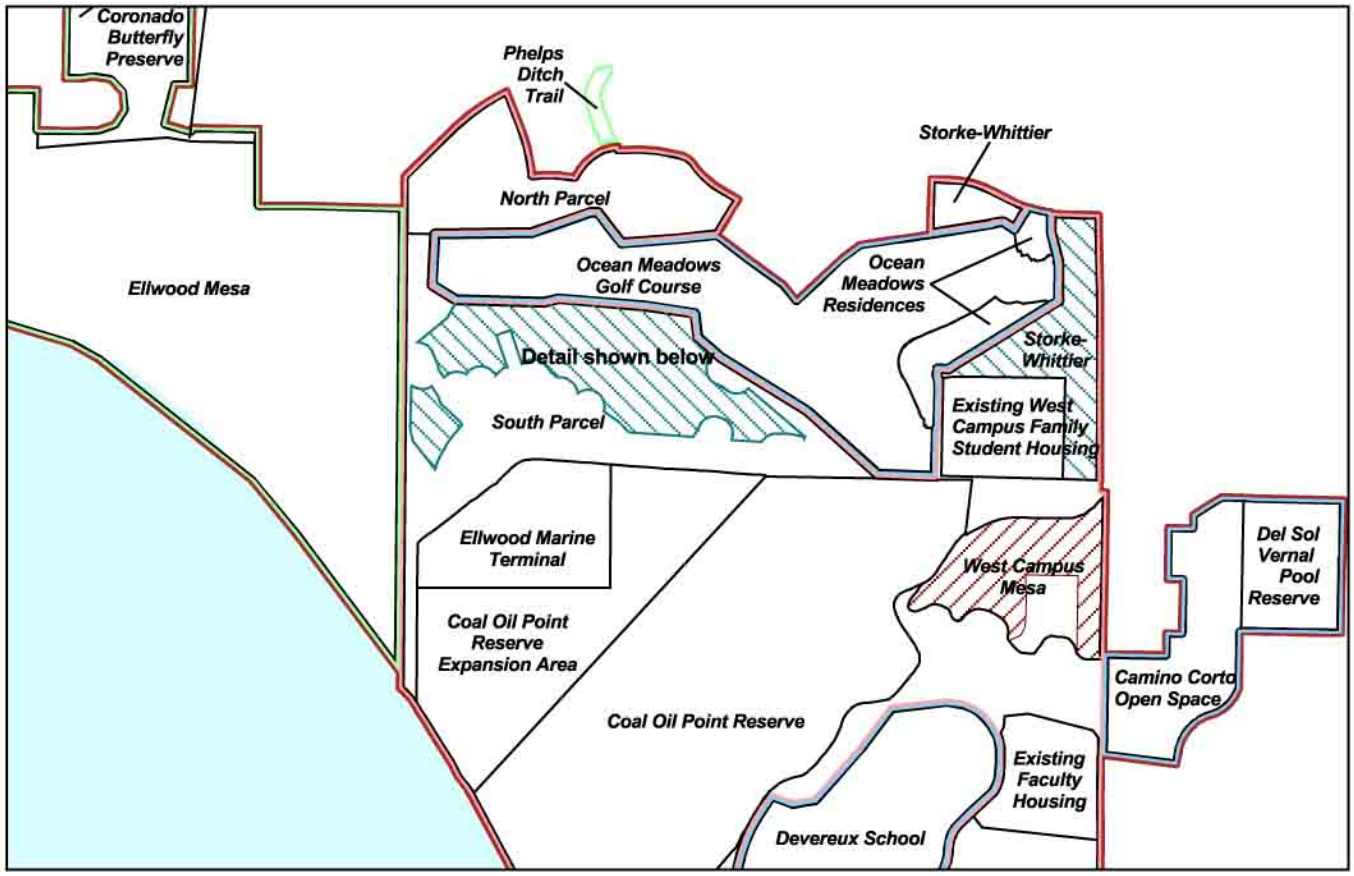
Table 6-2.
Summary of Project and Site Characteristics:
South Parcel Faculty Housing

Proposed Land Use	Residential: courtyard, duplex, and single-family housing	
Residential Dwelling Units Proposed	Detached Single Family	105
	Attached Single Family	22
	Courtyard Townhouse	48
	Duplex Housing	8
	Courtyard Apartment	24
	Total:	207
Building Height	35 feet	
Total Development	342,250 gross square feet	
Proposed Parking Spaces	2 per unit	414
	On-Street	75
	Total:	489
Undeveloped Open Space	28.7 acres	
Project Access	Vehicular: Storke Road and a reconstructed Venoco Access Road Pedestrian: Trails from to the Windrow Trail on the west and east from Storke Road	

6.4.1.5 Sierra Madre Family Student Housing

Similar to the proposed project, the Sierra Madre Family Student Housing component of this alternative would provide 151 units situated on approximately 10.7 acres of the 14.8-acre parcel, along with parking provided on the 2.8-acre lawn area located east of the existing West Campus Family Student Housing. Housing would be located along Storke Road, from north of the El Colegio and Storke Road intersection towards Whittier Drive, then westward along Whittier Drive. No development would occur on the parcel located west of the existing Ocean Meadows Golf Course parking lot. The housing would be provided in seven clustered complexes along Storke Road (refer to Figure 3.4, in Chapter 3, Project Description), set back a minimum of 75 feet from Storke Road and 50 feet from the golf course.

The buildings would generally consist of two- and three-story buildings with single level flats with a maximum building height of 35 feet, arranged around courtyard green spaces. Units would be three bedrooms with two baths and average 1,380 gross square feet. Project amenities would include an approximately 7,375-square-foot community building with meeting, laundry and recreation facilities, an approximately 725-square-foot storage building, and play structures for toddlers and school-age children. With the support space, the amount of developed space would total approximately 182,000 gross square feet. A site plan for the proposed Sierra Madre Family Student Housing is presented on Figure 3-4 (Project Description) and a conceptual rendering is provided in Figure 3-5 (also in the Project Description).



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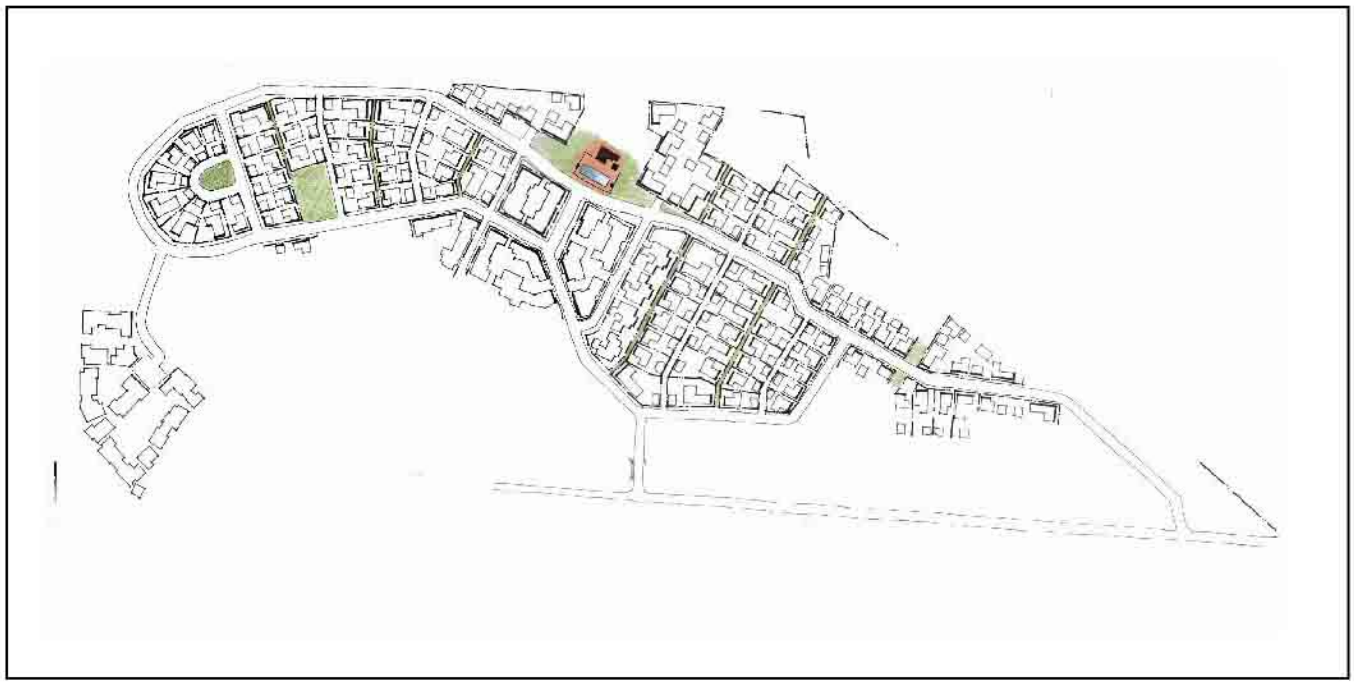

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UCSB	Faculty & Family Student Housing, Open Space Plan & LRDP Amendment EIR **University of California, Santa Barbara**	Figure 6-1. South Parcel Housing Site Plan	April 2004

Approximately 10.7 of the 14.8 acres on the main Storke-Whittier Parcel would be occupied by structures, roads and parking lots, with an additional 2.8 acres of existing lawn area (adjacent the West Campus Family Student Housing complex) converted to surface parking. Thus, physical improvements would occupy a total area of approximately 13.5 acres.

Grading activities would include approximately 9,400 cubic yard of fill and approximately 5,900 cubic yards of cut, with a net import of approximately 3,500 cubic yards. All building pads would be elevated at least 1 foot above the 100-year flood hazard zone, to reduce potential flood hazards to building occupants. To minimize runoff from impervious surfaces, pervious areas, vegetated filter strips, and porous pavements would be utilized where appropriate. Surface runoff would be conveyed via surface channels and cobbled swales into bioswales landscaped with native wetland plant species prior to prior to discharge into the eastern tributary of Devereux Creek. As required by law, a Storm Water Pollution Prevention Plan (SWPPP) will be implemented on the site, reducing run-off impacts.

Development would include a total of 552 parking spaces, 219 of which would replace existing parking for the adjacent West Campus Apartments that would be removed during construction, for a net increase of 333 spaces (2.2 spaces per unit) to serve the new housing. Much of the frontage along Storke Road would be occupied by a landscaped parking lot. A landscape buffer and Class I bike path or multi-use trail would separate this parking area from Storke Road.

Table 6-3.
Summary of Project and Site Characteristics:
Sierra Madre Family Student Housing

Proposed Land Use	Residential: single level flats	
Proposed Dwelling Units	151 units	
Building Height	35 feet	
Total Development	229,740 gross square feet	
Proposed Parking Spaces	Replacement Parking:	219
	Sierra Madre Parking (Net New) Spaces:	333
	Total:	552 spaces
Undeveloped Open Space	3.1 acres	
Project Access	Vehicular: Whittier Drive (1 access points) and Storke Road (3 access points) Pedestrian: Whittier Drive, Storke Road	

Access to the northern cluster of residential units would be provided via a driveway off of Whittier Drive and a driveway on Storke Road. Vehicular Access to the southern residential clusters would be provided via a driveway off Storke Road, and a new access road, located

generally at the same location at the existing Venoco Access Road (to the Ellwood Marine Terminal [EMT]). The reconfigured road would also provide access to the existing West Campus Family Student Housing complex and an adjacent private residential development on the southeastern side of the Ocean Meadows Golf Course (discussed more fully in the separate EIR prepared by the County of Santa Barbara for the Ocean Meadows Residences).

6.4.1.6 COPR Management Plan

The Draft COPR Management Plan would continue to be implemented, including that 40-acre portion of the reserve designated as an expansion area in 1998. Management actions would continue to protect snowy plover habitat, remove nonnative vegetation, restore degraded habitat areas, and replace existing informal trails with boardwalks and/or coastal access stairways, at the western edge of the original reserve, and west of Coal Oil Point, to reduce coastal erosion and increase protection of the snowy plover habitat area.

6.4.2 Construction Phasing

As this project would involve the same amount of residential construction, the schedule for implementation of this alternative would be the same as the proposed project, with an approximately 30-month construction period.

6.4.2.1 Comparison of Environmental Effects

A comparison of the potential environmental effects of this alternative to the proposed project follows. This analysis assumes that relevant LRDP Policies would be implemented, which are identified for each environmental topic in Chapter 3 (and thus are not repeated herein). In addition, mitigation measures identified for the proposed project are also assumed to be implemented, as relevant to this alternative.

6.4.2.2 Geology and Geologic Hazards

Similar to the proposed project, as no septic tanks or alternative wastewater systems would be provided under this alternative, no effects associated with soils incapable of adequately supporting these systems would occur, and *no impact* would occur.

Impact 4.2-1. Development of the South Parcel Alternative could expose people and/or structures to potentially substantial adverse effects resulting from seismic surface rupture, ground shaking, ground failure, or landslides. With implementation of identified mitigation measures, this impact would be reduced to a *less-than-significant* level. Although residential development would occur over a larger area, fewer units of housing would be provided, and potential impacts would be less than the proposed project.

Development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel, would increase the amount of occupied building

space on the North Campus, and expose structures and residential occupants to potentially adverse effects related to seismic activity.

Areas of the South Parcel have mass movement potential, owing to steep slopes. The Storke-Whittier Parcel contains an area considered to have liquefaction potential, underlying the edge of this alternative. The site also has an area of mass movement potential; however, no structures are proposed on that portion of the Storke-Whittier site.

Implementation of MM 4.2-1(a) (setback from coastal bluffs), MM 4.2-1(b) (adherence to recommendations of a project-specific geotechnical report, and MM 4.2-1(c) (setbacks from potential hazards based on geotechnical studies) would reduce potential impacts to a *less-than-significant* level.

Impact 4.2-2. Grading and/or excavation of soils in association with the South Parcel Alternative could result in substantial soil erosion and the loss of topsoil. With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant level*. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

The South Parcel is undeveloped, but heavily disturbed by historic activities, including expansive cut and fill areas created during the construction of the Ocean Meadows Golf Course, and from ongoing informal recreational use. The native and cut and fill soils have variable erosion potential. The Storke-Whittier Parcel has both cut and fill soils, with variable erosion potential, and some native soils, which have low erosion hazard potential.

Residential development on the South Parcel and the Storke-Whittier Parcel would require the removal and recompaction of soils on site and grading, followed by construction of buildings and landscaping of associated open spaces. Trenching, grading, and compacting associated with construction of structures, modification/relocation of underground utility lines, and landscape/hardscape installation could expose areas of soil to erosion by wind or water during these construction processes, which would occur over a 30-month period.

Since the South Parcel site does not contain steep slopes, the potential for erosion by water through surface drainage during construction would be reduced. Earth-disturbing activities associated with construction would be temporary and would not result in a permanent or significant alteration of significant natural topographic features that could increase or exacerbate erosion. Specific erosion impacts would depend largely on the areas affected and the length of time soils are subject to conditions that would be affected by erosion processes. Although the potential for erosion would be limited, exposure of soil to wind and water during construction would still occur.

Under this alternative, erosion during construction would be minimized by incorporating all recommendations regarding erosion potential outlined in geotechnical and soil analyses prepared for residential developments under MM 4.2-1(c). In addition, implementation of MM 4.2-2(a)

through 4.2-2(e) during development of this alternative would further reduce effects from erosion, and impacts would be reduced to a *less-than-significant* level. As development would occur over a larger area, impacts would be greater than the proposed project.

Impact 4.2-3. Construction of the South Parcel Alternative in areas underlain by soils of varying stability could subject people and structures to hazards associated with landsliding, lateral spreading, subsidence, liquefaction, collapse, or differential settlement. With implementation of identified mitigation measures, this impact would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Residential development would occur on approximately 40 acres of the South Parcel and approximately 13.5 acres of the Storke-Whittier Parcel. The soils underlying the South Parcel and the Storke-Whittier Parcel are primarily artificial fills, and soil characteristics could affect the structural integrity of proposed development. Although native soils on the South Parcel do not have liquefaction potential, the unconsolidated artificial fill could be considered prone to settlement and liquefaction. In addition, soils on the Storke-Whittier Parcel are of a soft, saturated nature (estuarine deposits), and present the potential for settlement and liquefaction. Erosion and mass movement (landslide) potential may exist on the small slopes within the erosional features of the South Parcel.

Design, construction and operation of this alternative would be required to implement MM 4.2-1(a) through 4.2-1(c), as discussed under impact 4.2-1. While project development as proposed could potentially result in exposure of structures or people to hazards of geological instability, implementation of the identified Mitigation Measures would reduce this impact to a *less-than-significant* level.

Impact 4.2-4. Implementation of the South Parcel Alternative could result in construction of facilities on expansive soils, creating substantial risk to people and structures. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As a larger area would be subject to development under this alternative, potential impact would be greater than the proposed project.

A soil's potential to shrink and swell depends on the amount and types of clay in the soil. The higher the clay content, the more the soil will swell when wet and shrink when dry. Expansive soils can cause structural damage to foundations and roads without proper structural engineering and are generally less suitable or desirable for development than nonexpansive soils because of the necessity for detailed geologic investigations and costlier grading applications. As discussed previously in Section 4.2 (Geology and Geologic Hazards), the soils underlying the sites of residential development are not considered expansion prone (low shrink-swell potential). Appropriate engineering design to address the issue of expansive soils would be addressed through adherence to MM 4.2-1(c). Therefore, risk of hazards associated with expansive soils would be reduced to a *less-than-significant* level.

6.4.2.3 Hydrology and Water Quality

Impact 4.3-1. Implementation of the South Parcel Alternative would not violate existing water quality standards related to stormwater runoff or waste discharge requirements related to wastewater discharge. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Development of faculty housing on the South Parcel would involve the grading and disturbance of approximately 40 acres of land. Development of the Sierra Madre Family Student Housing complex on the Storke-Whittier site would involve disturbance of approximately 13.5 acres of land. Residential development would include bioswales, pervious pavements or other drainage features that would direct runoff into landscaped areas, treatment wetlands, or other structural water quality control features, prior to discharge into tributaries of Devereux Creek.

To reduce construction and operational impacts, this alternative would comply with the requirements of the Storm Water Management Plan for the University. Prior to construction of any project component that would result in the disturbance of one acre or greater, a SWPPP shall be prepared that describes the site, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, control of post-construction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls.

The campus is not considered a point-source of water pollution for regulatory purposes and is not subject currently to any Waste Discharge Requirements established by the Central Coast Regional Water Quality Control Board (RWQCB). As discussed in Section 4.7 (Hazards and Hazardous Materials), no hazardous wastes are discharged into the sewer or storm drainage system on campus. The Goleta West Sanitary District (GWSD) treatment plan would provide treatment of all wastewater generated by residential development, and would remain responsible for meeting federal and state requirements, including applicable Waste Discharge Requirements established by the RWQCB. The GWSD does not anticipate any treatment capacity problems associated with project implementation, and thus is anticipated to continue to comply with all wastewater treatment requirements of the RWQCB.

With adherence to SWPPP and SWMP requirements, the South Parcel Alternative would not violate any water quality standards or waste discharge requirements, and this impact would be reduced to a *less-than-significant* level.

Impact 4.3-2. Implementation of the South Parcel Alternative would not deplete groundwater supplies substantially or interfere with groundwater recharge. This impact would be *less than significant*. As residential development would occur over a greater area, potential impacts would be greater than the proposed project.

Development of housing on 40 acres of the South Parcel and the 13.5 acres on Storke-Whittier Parcel could result in an increase in impervious surfaces of approximately 28.8 acres, based on

an assumed 50 percent coverage of structures, roads, and parking areas. As the total area of the North and West Campuses are approximately 394 acres, implementation of this alternative could result in coverage of 7.3 percent of the project area with impervious surfaces. With an estimated surface area of the Goleta Groundwater Basin of approximately 9,210 acres (California Department of Water Resources, 2003), an increase in impervious surfaces of approximately 28.8 acres would decrease groundwater recharge in an area of approximately 0.3 percent of the groundwater basin. The proposed residential development would incorporate bioswales and the use of landscaped areas to filter stormwater runoff, which would promote groundwater infiltration. Thus, although the amount of impervious surfaces would increase, much of the runoff from those areas would be discharged via bioswales into unlined creek channels, and thus would not substantially interfere with the recharge of groundwater. The project area is not designated as a groundwater recharge area, nor serves as a primary source of groundwater recharge in the sub-basin. Thus any reduction in groundwater recharge would not substantially deplete groundwater supplies.

This alternative would also increase demand for potable water, which could increase demand on local groundwater supplies. As discussed more fully in the Public Services discussion for this alternative, the Goleta Water District, which supplies the project area currently delivers approximately 15,800 acre feet per year of water, of which approximately 2,000 acre feet, or about 12.6 percent, is from groundwater. This alternative would implement water conservation measures to reduce demand for potable water. Therefore, implementation of this alternative would not deplete groundwater supplies substantially.

Implementation of the South Parcel Alternative would not deplete groundwater supplies substantially nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, and this impact would be *less than significant*.

Impact 4.3-3. Implementation of the South Parcel Alternative would not substantially alter drainage patterns and would not result in substantial erosion or siltation on or off site. This impact would be *less than significant*. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Development of faculty housing would occur on approximately 40 acres of the South Parcel, which currently drains via sheetflow and several highly eroded gullies to Devereux Creek and several small wetlands on the site. Residential development would alter drainage patterns through installation of buildings, parking lots, roads, and related infrastructure. Surface runoff would be conveyed via surface channels and cobbled swales into bioswales that would discharge runoff to Devereux Creek.

Development of the Sierra Madre Family Student Housing complex would occur on approximately 13.5 acres of land on the Storke-Whittier Parcel, which currently drains via sheetflow to Storke Road and drainage channels within the housing complex. Residential development would result would alter drainage patterns by installation of buildings, parking lots,

roads and related infrastructure. Drainage from residential development would be conveyed via bioswales and landscaped areas prior to discharge into the eastern tributary channel of Devereux Creek. Runoff from the surface parking area (east of the existing Family Student Housing complex) would be conveyed to existing drainage facilities located along Storke Road or within the existing housing complex. The proposed drainage system on the Storke-Whittier Parcel subject to residential development would generally mimic existing conditions, with runoff conveyed via cobbled swales and landscaped areas prior to discharge into the eastern tributary of Devereux Creek. The University would prepare a Stormwater Pollution Prevention Plan for project components that would disturb one acre or greater, and implement applicable provisions of the UCSB SWMP.

A 60 x 42-inch ~~box~~ culvert would be installed on Devereux Creek (under the Venoco Access Road) to replace two existing 24-inch corrugated metal pipes, which could reduce sediment deposition within Devereux Creek and increase sediment discharge into the Devereux Slough. To increase flood discharge capacity of the creek, in 2002, the County of Santa Barbara removed sediment from the creek channel within the southern portion of the Ocean Meadows Golf Course. Such removal of sediment reduces the potential for erosion of in-channel sediments as a result of culvert installation. Residential development on the South Parcel and Storke-Whittier Parcel would implement erosion control measures during construction and operation and reduce potential soil erosion, along with future sediment loads in Devereux Creek. To reduce potential soil erosion during construction of the culvert, MM 4.3.3(a) would be implemented to require installation during the dry season, MM 4.3.3(b) to stabilize exposed soil surfaces, and MM 4.3.3(c) to stabilize adjacent portions of the channel. With implementation of MM 4.3-3(a), MM 4.3-3(c), and MM 4.3-3(c), this impact would reduced to a *less-than-significant* level.

Impact 4.3-4. Implementation of the South Parcel Alternative would not substantially alter site drainage patterns or substantially increase the rate or amount of surface runoff and would not result in flooding either on or off site. With implementation of identified mitigation measures, this impact would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

As discussed under Impact 4.3-3, above, this alternative would result in minor alteration of drainage patterns in those areas subject to residential development. Development of housing on 40 acres of the South Parcel and 13.5 acres of the Storke-Whittier Parcel could result in an increase in impervious surfaces of approximately 28.8 acres, or approximately 7.3 percent of the project area. Although residential development would result in an increase in runoff, as the majority of the North and West Campuses would remain undeveloped, the increase in runoff from developed areas would not be substantial in comparison to existing conditions. Further, the use of bioswales to pervious areas to filter runoff would encourage infiltration of runoff from residential development.

Implementation of the South Parcel Alternative would not alter site drainage patterns substantially or increase the rate or amount of surface runoff substantially, and would not cause flooding either on or off site, and this impact would be *less than significant*.

Impact 4.3-5. Implementation of the South Parcel Alternative would not create runoff that could exceed the capacity of existing storm drain systems or provide substantial sources of polluted runoff. As residential development would occur over a larger area, potential impacts would be greater than the proposed project. However, this impact would be *less than significant*.

As discussed under Impact 4.3-3 above, this alternative would result in minor alteration of drainage patterns in those areas subject to residential development. As discussed under Impact 4.3-4 above, this alternative would result in an increase in impervious areas of approximately 7.3 percent of the North and West Campus, and this increase would not result in substantial increases in surface runoff. With the proposed installation of a culvert on Devereux Creek under the Venoco Access Road (discussed above under Impact 4.3-4), the increase in runoff associated with residential development would not result in runoff volumes that would exceed the capacity of existing or planned stormwater drainage systems.

Development of new housing and associated parking would result in an increase of impermeable surface areas, which could result in additional stormwater runoff that may contain stormwater contaminants that are typical of urbanized areas. Common stormwater pollutants include oil and grease and metals from roadways and parking lots, pesticides, fertilizers and animal waste from landscaped areas, and trash. The University would implement applicable provisions of the Storm Water Management Program, described above under Impact 4.3-1, to reduce potential stormwater contaminants from construction and operation of the proposed project.

With implementation of the proposed drainage improvements and compliance with the applicable provisions of the University's SWMP, implementation of the South Parcel Alternative would not alter site drainage patterns substantially or increase the rate or amount of surface runoff substantially, and would not exceed the capacity of existing storm drain systems or provide substantial sources of polluted runoff, and this impact would be *less than significant*.

Impact 4.3-6. Implementation of the South Parcel Alternative would not include the construction of new stormwater drainage systems, but would include the expansion of existing stormwater drainage systems, the construction of which could result in significant impacts. As fewer drainage modifications would occur under this alternative, potential impacts would be less than the proposed project. With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

As discussed above under Impact 4.3-3, development of faculty housing on the South Parcel would include installation of a culvert on Devereux Creek, under the Venoco Access Road. No other modifications to drainage facilities are proposed, with the exception of minor extension of existing drainage culverts or surface channels, which would accommodate runoff from some locations of project development. Installation of a culvert under the Venoco Access Road, or other minor extensions of existing storm drain facilities would contribute to potentially significant impacts related to construction noise. Implementation of MM 4.13-2, to limit hours of construction, MM 4.13-6(a), to require that stationary construction equipment be located away from residential areas, and MM 4.13-6(b), require signage with contact information for

construction noise complaints, would reduce potential construction effects associated with expansion of storm drain facilities. Given the distance of the culvert to residential areas, the limited extent of improvement and the proposed mitigation measures, noise impacts associated with storm drain facility improvements would be reduced to a less-than-significant level.

With implementation of the identified mitigation measures, implementation of this alternative would expand existing drainage facilities, however the construction of which would not cause significant environmental effects, and this impact would be reduced to a *less-than-significant* level.

Impact 4.3-7. Implementation of the South Parcel Alternative would not otherwise degrade water quality substantially. As residential development would occur over a larger area, although fewer residential units would be occupied, impacts would be greater than the proposed project. . However, this impact would be *less than significant*.

As discussed under Impacts 4.3-1, 4.3-3, 4.3-4, and 4.3-5, residential development, coastal access improvements, and habitat restoration and management of open space could expose soil surfaces during construction and ground disturbance activities, and result in operational increases in runoff volumes that would contain urban contaminants. For development on areas greater than one acre, an SWPPP would be prepared to minimize erosion during construction. In addition, the University would implement other applicable provisions of the campus' SWMP, including construction and operational BMPs to reduce potential water quality impacts.

With compliance with provisions of an SWPPP during construction and provisions of the SWMP, implementation of the proposed project would not otherwise substantially degrade water quality, and this impact would be *less than significant*.

Impact 4.3-8. Implementation of the South Parcel Alternative would not place housing within a 100-year flood hazard area. As fewer residential units would be placed near the 100-year flood hazard zone, this impact would be less than the proposed project. However, this impact would be *less than significant*.

Installation of a culvert on Devereux Creek under the Venoco Access Road would reduce the 100-year flood hazard elevation level by approximately 1.72 feet at the culvert structure (Penfield and Smith, 2004) and 0.42 feet at the Sierra Madre Family Student Housing. With the proposed reduction in flood elevation, the Faculty Housing on the South Parcel and the Family Student Housing on the Storke-Whittier Parcel would not be located within a flood hazard area, and this impact would be *less than significant*.

Impact 4.3-9. Implementation of the South Parcel Alternative would not place structures within a 100-year flood hazard area and would not impede or redirect flood flows. This impact would be *less than significant*. As no bridge would be provided over Phelps Ditch, no bridge supports would be placed within the 100-year flood hazard zone, potential impacts would be less than the proposed project.

This alternative would include installation of a culvert on Devereux Creek, as discussed above under Impact 4.3-8, which would be designed to facilitate and not impede discharge of the creek. Thus, the proposed project would not result in the placement of structures within a 100-year flood hazard zone and this impact would be *less than significant*.

Impact 4.3-10. Implementation of the South Parcel Alternative would alter site drainage patterns, but would not expose people or structures to significant risk of loss, injury, or death involving flooding. As less residential development would occur under this alternative, potential impacts would be less than the proposed project. However, this impact would be *less than significant*.

As discussed above, implementation of this alternative would only result in minor alterations to site drainage patterns or increases in runoff. Installation of a culver on Devereux Creek would reduce the extent of the 100-year flood hazard area, such that no residential structures would be located within the hazard area. Thus, the South Parcel Alternative would alter site drainage patterns, but would not expose people or structures to significant risk of loss, injury, or death involving flooding, and this impact would be *less than significant*.

Impact 4.3-11. Implementation of the South Parcel Alternative would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. With implementation of relevant LRDP Policies, this impact would be *less than significant*. Although residential development would occur over a larger area, the risk from a seiche, tsunami, or mudflow would not be increased, and this impact would be comparable to the proposed project.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. There are three enclosed surface water bodies in or near the project site: Goleta Slough, the Campus Lagoon, and Devereux Slough; however, because of their relatively small size, none of these bodies pose a threat to people or structures in the event of a seiche. Because the UCSB campus is along the Pacific coast, there is the potential for tsunami to affect the site. Tsunami inundation elevations in the Santa Barbara area are approximately 5.5 feet for a 100-year event and approximately 11 feet for a 500-year event (Houston and Garcia, 1974). Most of the project site is above the elevation of the 100-year tsunami run-up event. The Federal Emergency Management Agency Floodway map for the site area (1985) shows only the shoreline as a tsunami flood hazard area.

The potential for mudflows to affect the project area is limited to areas immediately adjacent to the coastal bluffs around the University. The steep bluff faces are susceptible to failure, particularly if runoff is concentrated onto these slopes. This alternative does not proposed any development in proximity to the bluffs.

Implementation of this alternative would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and this impact would be *less than significant*.

6.4.2.4 Biological Resources

Impact 4.4-1. Development of the South Parcel Alternative could result in adverse impacts to candidate, sensitive, or special-status plant and wildlife species. As residential development would occur over a larger area and the Open Space Plan would not be implemented, potential impacts would be greater than the proposed project. However, with the inclusion of identified mitigation measures, this impact would be reduced to a *less-than-significant* level

Grading and clearance of approximately 53.5 acres of land on the South Parcel and the Storke-Whittier Parcel would result in adverse impacts to candidate, sensitive, or special-status plant and wildlife species.

Development of approximately 40 acres of the South Parcel would remove mostly nonnative annual grassland that has been subject to much disturbance, which includes white-tailed kite nesting sites, a monarch aggregation site, two historic badger burrows, and the location of a recent burrowing owl siting. A population of southern tarplant occurs in the southwest portion of the property, but would be outside the development footprint. Vernal pools, wetlands and other riparian vegetation areas on the South Parcel would remain and continue to provide habitat for sensitive invertebrate species.

Development of Family Student Housing on the Storke-Whittier Parcel would result in the removal of nonnative grasslands that have been subject to much disturbance. The parcel supports three populations of southern tarplant, and an ESHA-designated vernal pool and flood control channel that connects to the northern portion of the Ocean Meadows Gold Course. Development of the site would require extensive grading that could potentially impact the tarplant populations, the vernal pool, and the channel. Development on this parcel would reduce foraging opportunities for local raptors and other grassland birds.

Under this alternative the COPR, including the 40-acre expansion area, would continue to be managed to preserve and restore sensitive habitat and species. Several populations of southern tarplant occur within the COPR and Expansion Area. The only records of sensitive beetles, including globose dune beetle, and sandy tiger beetle, are from the sandy areas near the mouth of Devereux Slough. Nesting and wintering Western snowy plovers, a federally threatened species use the beaches of the COPR, which have been federally designated as critical habitat. Belding's savanna sparrow, a state endangered species, routinely nests within the marsh habitats of Devereux Slough. The extensive dune scrub and coyote bush scrub habitats within this area could provide nesting habitat for sensitive birds such as the loggerhead shrike and California thrasher. The vernal pools of the COPR and Expansion Area could provide habitat for sensitive invertebrates.

This alternative could impact critical habitat and the snowy plover in two ways. First, the COPR Management Plan will result in improvement of beach access points, which could lead to disturbance of nesting birds during construction that results in loss of nests. Secondly, the formalization of trails and access routes, and construction of new dwellings in the area could

lead to an incremental increase in use of the beach by the public and their pets. Residential development, though reduced in overall amount, would be more proximate to beach areas. Unless regulated, increased dog and equestrian use of the beach could result in the destruction of nests, disturbance of adults that exposes nestlings to predation, increased predation of adult plovers, and an overall reduction in successful nesting attempts. Unless regulated, violation of the federal Endangered Species Act and a significant impact could occur.

Under this alternative, the Open Space Plan would not be implemented, thus trail and open space improvements would not be implemented and potential impacts to sensitive species associated with implementation would not occur. However, the beneficial impacts associated with the Open Space Plan, including the project's contribution to the preservation and enhancement of 652 consolidated acres of recreational, natural reserve, and marine environment resources would also not occur. Further habitat loss and disturbance from unregulated existing recreational activities would continue to occur on the North Parcel, the West Campus Mesa, and the West Campus Bluffs.

Under this alternative development occur close to sensitive habitat areas and the most valued recreational lands, while less valuable land (that is, the North Parcel) would remain undeveloped. Islands of development would fragment open space and the overall ecosystem in the area, even taking careful planning and mitigation into account.

To address potential impacts of the alternative to special status species, the University would implement MM 4.4-1(a) through 4.4-1(o) and MM 4.4-2(e). With implementation of these mitigation measures, this alternative would not have a substantial adverse effect either directly or through habitat modification, on any species identified as a candidate, sensitive or special-status species in local or regional plans, policies, or regulations; or by the CDFG, or by the USFWS, and this impact would be reduced to a *less-than-significant* level.

Impact 4.4-2. Development of the South Parcel Alternative could result in the modification or removal of vegetation communities or habitats that are designated and/or identified as sensitive by the CDFG, USFWS, and/or local agencies. With the inclusion of identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

Development of 40 acres on the South Parcel and 13.5 acres on Storke-Whittier Parcel would disturb sensitive habitats, including native grasslands, riparian, and southern vernal pool habitats. (Potential impacts to wetlands are discussed under Impact 4.4-3 below.)

Development on the Storke-Whittier parcel would occur along Storke Road, except for that portion of the site that includes the eastern terminus of a flood control channel that connects to the Ocean Meadows Golf Course. The channel and its associated marsh vegetation occupy approximately 0.29 acre of the site. This channel does not support any riparian habitat and is not designated as ESH, and would not be impacted by proposed development.

The South Parcel supports approximately 4.4 acres of non-ESH designated riparian vegetation. Residential development and private and public paths and trails associated with this alternative would occur outside of the riparian area. Development of the site would require extensive grading that could, in the absence of mitigation, either indirectly impact the riparian vegetation due to erosion or other construction-related effects. Residential development would include the vegetated filter strips and bioswales landscaped with native wetland plant species to reduce impacts from runoff during operation.

Incorporation of planned restoration activities, mitigation and avoidance associated with CWA permitting, and MM 4.4-2(a) through 4.4-2(j) will reduce impacts to both ESHA and non-ESHA designated riparian vegetation to *less-than-significant* levels. Although residential development would occur over a larger area, no changes to the Phelps Ditch would occur under this alternative, and impacts to riparian vegetation would be less than the proposed project.

The South Parcel contains 0.05 acre of annual grasslands that are outside of the development footprint and Storke-Whittier Parcels does not currently contain any native grassland habitat, and no impacts would occur. However, as the Open Space Plan would not be implemented under this alternative, the proposed restoration and enhancement of vernal pool/native grassland complexes on the South Parcel would not occur.

The South Parcel contains two vernal pools totaling approximately 0.3 acre of ESH designated habitat. These areas are outside the residential development footprint and no impacts from habitat removal would occur. Increased human presence in the area could result in indirect impacts. The University would implement MM 4.4-2(a) though 4.4-2(j) to reduce impacts to sensitive habitats. With implementation of these mitigation measures, this impact would be reduced to a *less-than-significant* level. Although residential development would occur over a larger area, no direct impacts to vernal pools would occur under this alternative, and impacts to vernal pools would be less than the proposed project.

No direct impacts to Southern Dune Scrub, Southern Fordune, and Southern Coastal Bluff Scrub habitats would occur under this alternative. However, beneficial impacts associated with the proposed Open Space Plan would not occur. With implementation of MM 4.4-2(e), (g), and (i), this impact would be *less than significant*. Although direct impacts would be less than the proposed project, indirect impacts would be greater than the proposed project, due to the absence of trail closure and improvements and habitat restoration activities.

Impact 4.4-3. Residential development could result in a substantial adverse effect on federally protected wetlands through direct removal, filling, or hydrological interruption. With the inclusion of identified mitigation measures, this impact would be reduced to a *less-than-significant* level. Although residential development would occur over a larger area, direct impacts to wetlands impacts would be less than the proposed project. The beneficial impacts to wetlands associated with the Open Space Plan would also not occur.

The Storke-Whittier South Parcel contains 0.19 acre of Coastal Act wetlands and 0.12 acre of ACOE wetlands (at the southern edge of the driving range). The proposed site plan would not result in development within this area or the 100-foot buffer around these wetlands, and therefore there would be no impact as a result of residential development.

A total of 2.93 acres of Coastal Act wetlands and 0.19 acre of ACOE wetlands have been identified in the South Parcel. None of these wetlands, or the 100-foot buffer zone around these wetlands would be within the development footprint, and no direct impacts would occur. Indirect impacts could occur as a result of grading in preparation for development, construction of roads and utility corridors, creation of stormwater detention basins, expansion of current on-site wetlands, and other ground disturbing activities related to construction.

The expansion area of COPR includes approximately 3.2 acres of wetlands and wetland vegetation. Implementation of this Coal Oil Point Management Plan would provide for the protection, and if appropriate, restoration of these wetlands.

The West Campus Bluffs area contains 0.7 acre of wetlands in the form of vernal pools, and no direct impacts would occur. As the Open Space Plan would not be implemented, restoration of wetlands within this parcel would not occur under this alternative and there would be no formalization of access and trails. Disturbance due to existing trails and informal recreational use would continue.

In summary, the South Parcel Alternative would result no loss of wetlands. The University would implement MM 4.4-2(a) through 4.4-2(j), which are designed to either limit potential impacts to wetlands to ensure protection of existing wetlands. With implementation of these identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

Impact 4.4-4. Residential development could interfere with the movement of native resident or migratory wildlife species or corridors. Under this alternative, a larger area would be subject to residential development, fewer contiguous acres of undeveloped open space and natural reserve would be preserved, and potential impacts on wildlife movement would be greater than the proposed project. However, with implementation of identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

Although the development on the North Parcel would not occur, total developed acreage would increase, and the development of the South Parcel would lead to the loss of contiguous open space and decrease the current linkages between the Ellwood Mesa Open Space and the COPR and West Campus Bluffs. This would decrease the connectivity of surrounding landscape and further restrict and limit both wildlife movement and dispersal. In addition, the potential benefits associated with the Open Space Plan from habitat restoration would not occur.

Though the potential benefits of preservation of contiguous open space and natural reserve would not occur, the University would implement MM 4.4-4(a) through 4.4-4(c) to minimize lighting along the perimeter of the ESH and stream corridors, place restrictions on fencing to permit wildlife movement, and preserve contiguous habitat where feasible, to protect

environmentally sensitive habitat areas. With the inclusion of these mitigation measures would reduce impacts to a *less-than-significant* level.

Impact 4.4-5. Development of the South Parcel Alternative would be in substantial conformance with local applicable policies protecting biological resources. This impact would be *less than significant* and comparable to the proposed project.

Impact 4.4-6. Development of the South Parcel Alternative would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. *No impact* would result.

As there are no existing HCPs, NCCPs, or other approved local, regional, or state habitat conservation plans that are applicable to the project area, *no impact* would result from the South Parcel Alternative. This alternative would not implement provisions of the Open Space Plan that would improve management of biological resources throughout the project area. Beneficial impacts associated with implementation of an Open Space Plan would not occur. However, impacts associated with potential conflicts with an HCP, NCCP, or other approved local, regional, or state habitat conservation plan would be comparable to the proposed project.

6.4.2.5 Hazards and Hazardous Materials

Impact 4.5-1. Implementation of the South Parcel Alternative could expose University occupants or the public to a significant hazard due to the routine transport, use, disposal, or storage of hazardous materials. As residential development would occur on the South Parcel, in greater proximity to the EMT, impacts would be greater than the proposed project. However, this impact would be *less than significant*.

This alternative would result in development of faculty housing on the South Parcel, development of family student housing on the Storke-Whittier Parcel, and continued management of the COPR. These various project components would not result in the routine handling, use, or disposal of hazardous materials, with the limited exception of standard construction and cleaning products, chlorine and filters used in the proposed pool on the faculty housing site, and the limited application of pesticides associated with landscaping and maintenance practices in residential areas. No significant hazard to the public or the environment is anticipated through the routine transport, use, or disposal of hazardous materials associated with the construction or operation of residential development or the management of open space areas.

Development of additional housing could result in potential exposure of residential occupants and the public to hazards associated with the routine transport, use, disposal, or storage of hazardous materials associated with the existing EMT, which stores oil extracted from inland wells and then periodically conveys the stored oil to an offshore barge for collection. Implementation of this alternative would not increase the amount of hazardous materials used on and transported to and from this campus facility; however, the conveyance of hydrocarbons

via pipelines (generally located along the western edge of the University property) and subsequent storage in tanks (within the lease area) could pose a hazard to occupants of residential development and recreational users of Open Space areas. To date, there have been no recorded incidents of exposure of recreational users or residential occupants (of existing housing on the West Campus) to hazardous materials from operation of or transport to and from the EMT. Thus, no significant hazard to the public or the environment is anticipated from the continued routine operation of the EMT. (Potential hazards associated with an accidental release of hazardous materials from the terminal are addressed in Impact 4.5.6 below.)

The campus would continue to implement health and safety plans, programs, and procedures related to the use, storage, disposal, or transportation of hazardous materials that outline safe handling practices, provide for emergency clean-up procedures if an accidental exposure occurs, and designate safe disposal practices, all in compliance with federal and State laws and regulations. In addition, the campus would ensure that waste minimization efforts by the EH&S Office, including informational and educational programs, are strengthened. With continued compliance with applicable laws and regulations and implementation of existing hazardous materials programs, this alternative would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and this impact would be *less than significant*.

Impact 4.5-2. Construction of the South Parcel Alternative could expose construction workers to health and safety risks through earthmoving activities in areas with potentially contaminated soils or groundwater. With implementation of the identified mitigation measure, this impact would be reduced to *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Development of faculty housing would result in grading of approximately 40 acres of land on the South Parcel. Development of the Sierra Madre Family Student Housing complex would result in grading of approximately 13.5 acres of land on the Storke-Whittier Parcel. Restoration of habitat and management within the COPR could also result in ground disturbance in some locations; however, it is anticipated that such disturbance would generally be limited to small discontinuous areas, would only involve the use of hand tools or small power equipment.

Disturbance of soils could result in the exposure of University workers, residential occupants, or recreational users of Open Space areas to health or safety risks if contaminated soils (including contamination from historic petroleum operations) and/or groundwater are encountered during construction or maintenance activities. No development or other activities would occur within the EMT; however, such some minor ground disturbance could occur in proximity to the terminal, and thus contaminated soils and groundwater could be present at locations in proximity to the EMT.

Environmental concerns at the development site(s) primarily stem from previous oil production activities and former structures. As is typical of former oil field properties, construction activities involving grading and excavation could expose workers to contaminated soils and other hazards

associated with abandoned oil wells. The standard conditions of approval for the University include compliance with all applicable State and local regulations pertaining to abandonment of oil wells and remediation of associated hazards.

If required during construction activities, dewatering could result in the withdrawal of contaminated groundwater. If the groundwater contains contaminants above regulatory levels, the water could present a hazard to people or the environment unless properly managed. However, UCSB requires that contractors implement best management practices during construction dewatering to avoid exposure of campus occupants or construction workers to potentially contaminated groundwater.

To address the potential for encountering unidentified contamination, the campus would implement MM 4.5-2, which would require continued implementation of health and safety plans, programs, and procedures related to the use, storage, disposal, or transportation of hazardous materials that outline safe handling practices and provide for emergency clean-up procedures if an accidental exposure during earthmoving activities occurs, all in compliance with federal and State laws. As residential development would occur over a larger area, potential impacts would be greater than the proposed project. With implementation of MM 4.5-2, this alternative would not expose construction workers to health and safety risks through earthmoving activities, and this impact would be reduced to *less-than-significant* levels.

Impact 4.5-3. Development of the project could expose construction workers, occupants of new residential structures and recreational users of Open Space areas to the naturally occurring hazards of Radon-222, natural gas, and oil seeps. As residential development would occur over a larger area, potential impacts would be greater than the proposed project. However, with implementation of identified mitigation measures, this impact would be reduced to *less-than-significant* levels.

Implementation of this alternative would result in the development of housing and continued management of the COPR. Residential development could potentially place persons in closer proximity during construction and occupancy to the naturally occurring hazards of Radon-222 and natural gas and oil seeps.

Development of faculty housing on the South Parcel would occur in an area that contains an historic oil well and associated sump; thus, there is a possibility that natural gas and oil seeps occur elsewhere in the project area. These geohazards have the potential to result in a hazard to future residents of this alternative's development. Implementation of a buffer zone along any natural seeps that may be close to structures or residences and compliance with MM 4.5-2 in the event unanticipated contamination is discovered would ensure safety of residents located near them.

As discussed above, the possibility of radon gas being present on the site is considered low. Because radon is a gas, it can migrate through soil and cracks in building slabs or basement walls and concentrate in a building's interior. Should radon gas be present, it would present significant

health risks to residents of proposed development due to its carcinogenic effects. MM 4.5-3 would be required in order to identify the presence of radon gas.

The University would implement MM 4.5-3 to identify the presence of radon gas and undertake measures to reduce any such hazards. With implementation of MM 4.5-2 and 4.5-3, this impact would be reduced to a *less-than-significant* level.

Impact 4.5-4. Construction of the South Parcel Alternative could expose construction workers and the public to potential health risks associated with abandoned oil wells. As residential development would occur over a larger area, potential impacts would be greater than the proposed project. However, with implementation of identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

Several known former oil wells are located within the project area. However, because of the widespread extent of historical petroleum recovery operations throughout the development area, the potential exists for undocumented abandoned wells to be encountered during construction activities. Construction activities, in particular earthmoving and grading of the South Parcel and the Storke-Whittier Parcel, would result in construction over known (previously abandoned) wells and could also result in the discovery of unknown abandoned oil well(s). Continued management of the COPR would generally require less ground disturbance (than residential construction), and therefore would be less likely to encounter abandoned oil wells.

Implementation of MM 4.5-4(a) and MM 4.5-4(b) would ensure site characterization, well re-abandonment, and procedures in the event of discovery of oil wells. This alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and this impact would be reduced to a *less-than-significant* level.

Impact 4.5-5. Recreational use of open space area could expose the public to potential health risks in the event of the accidental discovery of an abandoned oil well. Because open space improvements would be reduced (compared to the proposed project), the potential risks of accidental discovery of an abandoned oil well would be reduced, and this potential impact would be less than the proposed project. With implementation of identified mitigation measures, this impact would be *less than significant*.

Under this alternative, open space improvements would be limited to management actions identified in the Coal Oil Point Management Plan. Continued recreational use of the North Parcel, COPR (in conformance with the Management Plan), and the West Campus would result in the accidental discovery of an abandoned oil well by recreational users. The potential exists for hikers, bicyclists, equestrians or other uses to encounter unknown abandoned oil wells in off-trail areas, on the beaches, or as a result of unauthorized use of areas that are closed to protect sensitive resources. However, the potential for the accidental discovery of an abandoned oil well by recreational users is considered remote.

Implementation of MM 4.5-4(a) and 4.5-4(b) would ensure site characterization, well re-abandonment (which would reduce future risks associated with recreational encounters with such wells), and procedures for accidental release of petroleum or hydrocarbon substances associated with unanticipated well discovery. With implementation of MM 4.5-4(a) and 4.5-4(b), this impact would be *less than significant*.

Impact 4.5-6. Implementation of the South Parcel Alternative could expose the public to potential health risks in the event of an accident or accidental release from the EMT. Due to residential development on the South Parcel, person would reside in closer proximity to the EMT, and this potential impact would be greater than the proposed project. However, with implementation of the identified mitigation measure, this impact would be *less than significant*.

Since the existing tanks at the EMT would continue to be used for the storage of hydrocarbon materials such as petroleum and oil, spills or accidental release of petroleum products may potentially occur in proximity to the proposed residential and recreational uses. These liquids and their associated vapors are flammable in nature, and there is an inherent risk for a fire or explosion in the event of an upset condition, which could lead to a release of chemicals into the environment. The results of a Quantitative Risk Assessment (QRA) of Platform Holly and the EMT Facility concluded that the main risk to the population from the Ellwood Facility is due to the separation and storage of liquefied petroleum gas (LPG) and natural gas liquids (NGL). These gas liquids produce large flame jets or boiling liquid expanding vapor explosions (BLEVEs) that if released, can affect a large area. The toxic risk was considered unacceptable based upon the County's Environmental Thresholds for public safety. A number of risk reducing measures were developed to reduce the overall risk from the EMT. With the implementation of these measures, the public risk from the EMT would be considered acceptable. In addition, Platform Holly does not store large quantities of flammable gas liquids and, therefore, has smaller hazard zones than the EMT.

Major hazardous materials accidents are extremely infrequent, and additional emergency response capabilities are not anticipated to be necessary, since no increase in the number of incidents that could result at the EMT would result from implementation of this alternative. Since residential development would occur on the South Parcel, in greater proximity to the EMT than current residential developments, this alternative increases the number of persons (approximately 927 people) that would be exposed to such risks. However, per MM 4.5-6, this alternative would not place any residential structures within 585 feet of the nearest EMT storage tank. This incorporation of the required setback results in an acceptable level of risk. In addition, the campus would comply with federal and State laws and regulations regarding hazardous materials by continuing to implement health and safety plans, programs, and procedures related to the use, storage, disposal, or transportation of hazardous materials as well as provide for emergency clean-up response procedures to minimize the risk if an accidental exposure, release, or spill occurs. Thus, with implementation of MM 4.5-6, no significant hazard to the public or the environment is anticipated from foreseeable upset at the EMT, and this impact would be reduced to a *less-than-significant* impact with respect to public hazard as a result of foreseeable

upset or accident conditions at the EMT involving the release of hazardous materials into the environment.

Impact 4.5-7. Implementation of the South Parcel Alternative would not result in construction on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would not create a significant hazard to the public or environment. There would be *no impact*. Although construction would occur in closer proximity to the EMT, no construction activities or disturbance would occur within the EMT, and this impact would be comparable to the proposed project.

Based upon review of federal, State, and County hazardous waste lists and databases pursuant to Government Code Section 65962.5, one known hazardous materials site (the EMT) exists on this alternative's site.

This alternative would result in development of faculty housing on the South Parcel and family student housing on the Storke-Whittier Parcel, and management activities in the COPR. No residential development or other construction activities would occur within the EMT area. Thus, this alternative would not involve construction on any site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and there would be *no potential impact*.

Impact 4.5-8. Implementation of the South Parcel Alternative would not result in a significant safety hazard for people residing or working in the project area associated with proximity to the Santa Barbara Municipal Airport. This impact would be *less than significant*. As no residential development would occur on the North Parcel, this impact would be less than the proposed project.

The Sierra Madre Family Student Housing and faculty housing on the South Parcel under this alternative would be located within the Airport Influence Area (AIA) of the Santa Barbara Municipal Airport. Location within the AIA would require notification of the annoyances or inconveniences (i.e., noise, aircraft overflight) associated with proximity to Airport Operations. However, no safety constraints have been identified. Therefore, this alternative's residential development would not result in risks due to their location within proximity to the Santa Barbara Airport.

The University also maintains an Emergency Operations Plan, which is designed with the intent to assist the University in preparation and response to all levels of emergencies with minimal impact. Thus, with continued implementation of public safety and emergency operation procedures, the incremental increase in persons residing and utilizing areas within the AIA would result in safety hazards that would be *less than significant*.

Impact 4.5-9. Implementation of the South Parcel Alternative could impair implementation of, or physically interfere with, an adopted emergency response or emergency evacuation plan. As residential development on the South Parcel would have less emergency access, potential

impacts would be greater than the proposed project. However, with implementation of identified mitigation measures, this impact would be *less than significant*.

Construction and operation activities associated with this alternative could potentially affect emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access on campus. The protocols by which emergencies are handled by the University under this alternative would be the same as for the proposed project.

The primary emergency access point to the Sierra Madre student housing development would be Storke Road and to the South Parcel faculty housing development would be Storke Road via the Veneco access road. Evacuation traffic can flow west and north, away from the North and West Campuses by turning east onto Phelps Road and then north onto Storke Road or by turning north onto Cannon Green Drive and then west onto Hollister Avenue. However, the primary emergency exit for the West and North Campuses would be north on Storke Road. Direction to available exits is given by the Police or through the Emergency Operations Department, if it is open. Parking services would also be utilized to assist in directing traffic along with their new illuminated sign boards for information and directions. However, vehicular access to residential development on the South Parcel may be restricted to a single roadway, which could impair emergency access. MM 4.5-9(a) and 4.5-9(b) would be required to ensure that this alternative's development would not impair implementation of, or physically interfere with, emergency response and evacuation efforts.

The University maintains an Emergency Operations Plan (EOP) that is disseminated campuswide, outlines procedures for all campus staff, students, and visitors to follow in case of an emergency, and is intended to assist the University preparation and response to all levels of emergencies with minimal impact. In addition, the campus would continue to implement the array of campus EH&S programs related to public safety and emergency procedures. However, residential development on the South Parcel may be restricted to access by a sole roadway, which could impair emergency access to residential development in that area. Implementation of MM 4.5-9(a) and MM 4.5-9(b) ensures that impacts associated with emergency response or evacuation would be *less than significant* by providing multiple emergency access or evacuation routes (revising the EOP as necessary) and coordinating roadway or travel lane closures with emergency response personnel.

Impact 4.5-10. Project implementation could expose people or structures to a risk of loss, injury, or death involving wildland fires. With implementation of identified mitigation measures, this impact would be reduced to *less-than-significant* levels. Fewer residences would be developed under this alternative but as no expansion of the trail system (which act as fire breaks as well as access ways for County fire suppression activity) nor implementation of fuel modification guidelines (the combination of vegetation removal, setbacks, fuel modification zones, and introduction of paved surfaces and formalized trails where none currently exist) for the open space areas would occur, this impact would be greater than the proposed project.

Under this alternative, residential development would occur on the South Parcel and the Storke-Whittier Parcel. Most of the project area proposed for development is generally considered a light fuel area with annual grasses, and as such is less vulnerable to large conflagrations. However, eucalyptus and other trees adjacent to the South Campus are a source of fuel for wildland fires, and fuel management of these eucalyptus stands has been limited due to biological sensitivity of the area.

The County Fire Department utilizes existing trails, including bike and foot trails, for access to wildland fires and for emergency response. Trails are considered by the County Fire Department to make good firebreaks. Water used in fighting fires is brought on site by response vehicles. The County's aerial fire combat program is organized for water drops; however, use of aerial fire retardants is not normally considered necessary in the project's coastal setting, nor is there any history of such use in the project area, but retardants could be used if absolutely necessary and the US Forest Service is equipped for retardants.

Implementation of MM 4.5-10(a) through 4.5-10(f) would reduce potential increased risks of wildland fires through landscaping techniques and adherence to fuel management procedures, and this impact would be reduced to a *less-than-significant* level.

6.4.2.6 Land Use

Impact 4.6-1. The South Parcel Alternative would be largely consistent with applicable land use plans, policies, and regulations.

Residential development would still occur under this development on the North and West Campus areas, which were designated for development by local plans and policies when they were acquired by the University. Under this alternative, 207 units of faculty housing would be developed on the South Parcel, and 151 units of family student housing would be developed on the Storke-Whittier Parcel, designation of the North Parcel as Open Space, and designation of the Coal Oil Point Reserve as Natural Reserve. The designations for development of 50 units of faculty housing on the West Campus Mesa, a 10,000 gsf expansion of the Orafalea Children's Center, and replacement of the Cliff House (with a structure equivalent to all existing structures at Coal Oil Point) would remain. The amended LRDP would, once adopted by the California Coastal Commission, serve as the Local Coastal Program for this portion of the University. The following discussion provides an evaluation of the proposed residential development and open space plan with respect to the existing, governing policy framework for the North and West Campus areas.

This alternative, however, would not implement the concepts articulated in the Joint Proposal, including the resultant Open Space Plan. The purpose of the Joint Proposal and associated Open Space Plan is to provide an open space, habitat, and development plan that is, on balance, most protective overall of sensitive natural and coastal resources. The Joint Proposal provides the opportunity to plan the preservation, management, and development of the Ellwood-Devereux area in a comprehensive rather than piecemeal fashion, and would allow for the

preservation and enhancement of 652 consolidated acres of recreational, natural land, and marine environment resources.

As compared with the Project, under this alternative development occur close to sensitive habitat areas and the most valued recreational lands, while less valuable land (that is, the North Parcel), which contains 2.95 acres of low to intermediate value wetland and riparian areas, would remain undeveloped. Under this alternative an island of development would occur on the South Parcel that would fragment open space and the overall ecosystem in the area.

Conservation of the Ellwood Mesa and Devereux Slough as an effectively functioning consolidated and restored ecosystem, which would occur if the proposed project is implemented, would not occur. Though the wetland and riparian areas on the North Parcel would not be disturbed by development, more significant habitat resources would be isolated and fragmented by development. Although direct impacts from development of this alternative could be mitigated to a less-than-significant level, the sustainability and value of the habitat resources to the overall ecosystem would be compromised over the long term as compared to the proposed project. The reason is that the proposed project would cluster development adjacent to existing developed area so that habitat resources could be better protected.

On balance, though potential environmental impacts could be mitigated to a less-than-significant level, development under this alternative would be less protective of significant coastal resources than the proposed project, as discussed in Table 6-4.

As required by Section 15125(d) of the CEQA Guidelines, this document discusses any inconsistencies between this alternative and applicable plans.

Goleta Community Plan

GCP – Policy LU-GV-2. Future growth and development shall occur in a manner that minimizes construction related impacts on the community.

Compatibility Analysis: The potential for short-term construction impacts resulting from implementation of the South Parcel Alternative are analyzed as part of this alternatives analysis. The campus would implement Mitigation Measures where feasible to reduce construction impacts in a manner that minimizes construction related impacts on the community. ***Compatible with Plan.***

The following policies are specific to the West Devereux area identified in the GCP. This area encompasses the North Campus area, the Venoco lease, and the Coal Oil Point Expansion area.

GCP – Policy LUDS-GV-2. The entire West Devereux Specific Plan area shall have a maximum build-out of 409 units. The existing Ocean Meadows golf course shall be designated PD 58 and zoned PRD 58. The remainder of the site, excluding the golf course, shall be designated PD 351 and zoned PRD 351. All development within the Specific Plan area shall comply with the following development standards:

Table 6-4.
South Parcel Alternative Consistency with the Coastal Act

Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
Article 1: General	
30200. (a) Consistent with the coastal zone values cited in Section 30001 and the basic goals set forth in Section 30001.5, and except as may be otherwise specifically provided in this division, the policies of this chapter shall constitute the standards by which the adequacy of local coastal programs, as provided in Chapter 6 (commencing with Section 30500), and the permissibility of proposed developments subject to the provisions of this division are determined. All public agencies carrying out or supporting activities outside the coastal zone that could have a direct impact on resources within the coastal zone shall consider the effect of such actions on coastal zone resources in order to ensure that these policies are achieved.	The analysis provided in this EIR considers the effect of the South Parcel Alternative, including residential development, coastal access improvements, and management of open space on coastal zone resources, and identifies project components and mitigation measures intended to ensure that coastal policies are achieved. Consistent with LRDP policy 30230.2, implementation of the South Parcel Alternative would involve University coordination with the County of Santa Barbara, City of Santa Barbara, and RWQCB to see that adjacent land uses are established and carried out in a manner that will sustain the biological productivity of campus marine resources.
(b) Where the commission or any local government in implementing the provisions of this division identifies a conflict between the policies of this chapter, Section 30007.5 shall be utilized to resolve the conflict and the resolution of such conflicts shall be supported by appropriate findings setting forth the basis for the resolution of identified policy conflicts. Public Resources Code section 30007.5 states: The Legislature further finds and recognizes that conflicts may occur between one or more policies of the division. The Legislature therefore declares that in carrying out the provisions of this division such conflicts be resolved in a manner on which balance is the most protective of significant coastal resources.	Implementation of the South Parcel Alternative would introduce development in a previously undeveloped and open area, non-contiguous with adjacent residential uses. Development in the South Parcel would interrupt the unbroken, integrated access system through 652 acres of open space proposed in the Open Space Plan, which would instead be fragmented and degraded in contravention of various policies in Chapter 3 of the Coastal Act. In addition, inconsistencies with the policies expressed in Section 30251 related to protection of visual resources have been identified. Accordingly, balancing pursuant to Section 30007.5 is required. Section 30007.5 recognizes "that broader policies which, for example, serve to concentrate development in close proximity to urban and employment centers may be more protective, overall, than specific wildlife habitat and other similar resource policies." Under the South Parcel Alternative, 40 acres of natural reserve would be preserved as the COPR Expansion Area. However, the Joint Proposal would not be implemented, along with the other open space improvements proposed for the South Parcel and West Campus Bluffs, with the exception of landscape associated with the new housing on the South Parcel. In addition, if the Open Space Plan is not implemented, existing uses of the project area that conflict with Coastal Act policies would continue, development would occur under existing approved plans, policies and regulations would occur. The

Table 6-4.
South Parcel Alternative Consistency with the Coastal Act

Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
	most significant recreational opportunity presented by the Open Space Plan – the opportunity to preserve the unique and irreplaceable recreational opportunity of an unbroken natural open-space area consisting of 652 acres adjacent to the coast – would be lost to residents and visitors alike. The recreational experience of the area would be diminished and interrupted by the proximity of residential development and daily activity. Accordingly, in this case, implementation of the broader policy, expressed by the Legislature in Section 30007.5 of the Coastal Act, of concentrating development in close proximity to other development would not occur, and, thus, the South Parcel Alternative is less protective overall relative to specific wildlife habitat and other similar resource policies expressed in Chapter 3 (specifically those policies expressed in Section 30233 and 30255) because it would not preserve and restore an integrated coastal open space ecosystem, and its attendant access and recreational opportunities. Implementation of Section 30007.5's broader policy of concentrating development in close proximity to other development would occur with the proposed project but not with the South Parcel Alternative. On balance, therefore, the South Parcel Alternative is less protective of significant coastal resources than the proposed project.
Article 2: Public Access	
30210. In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.	Consistent with LRDP policy 30221.1, the proposed student and faculty housing projects would contain recreational facilities and open space so as not to overburden oceanfront recreational areas. MM 4.10-1(a) ensures that the public can use campus recreational facilities, including recreation fields, when not occupied by University classes or programs; this would help alleviate some public use of the project's proposed open space areas. Consistent with LRDP policy 30210.2, public access to campus beaches from adjoining beaches and all stairway or pathway access routes mapped in Figure 26 in the 1990 LRDP would remain open to protect the permanent right of the public for pedestrian access and appropriate recreational uses of the beach at all times, except as provided for in policy number 30210.17. Consistent with LRDP policy 30253.3, the South Parcel

Table 6-4.
South Parcel Alternative Consistency with the Coastal Act

Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
	Alternative would not develop on the bluff face, except for staircases or access ways to provide public beach access and pipelines for instructional or research-oriented use. The South Parcel Alternative would not provide the extensive open space improvements as outlined in the proposed project, with the exception of the improvements in the COPR expansion area. Development within the COPR or on the dry sand beach would not occur (consistent with LRDP policies 30230.1 and 30235.2). While the South Parcel Alternative does provide some open space improvements (in the COPR Expansion Area only) consistent with Section 30210, the improvements are not as extensive as those under the proposed project and would not provide the same benefits. In addition, Implementation of the South Parcel Alternative would remove the opportunity for an unbroken, integrated, access system through 652 acres of consolidated, permanently preserved and restored open space that would further public access to coastal resources, as the Joint Proposal (and the Open Space Plan) would not be implemented. Again, if the Open Space Plan is not implemented, existing uses of the project area that conflict with Coastal Act policies would continue, development would occur under existing approved plans, policies and regulations would occur. The most significant recreational opportunity presented by the Open Space Plan – the opportunity to preserve the unique and irreplaceable recreational opportunity of an unbroken natural open-space area consisting of 652 acres adjacent to the coast – would be lost to residents and visitors alike. The recreational experience of the area would be diminished and interrupted by the proximity of residential development and daily activity.
30211. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.	Residential development and open space improvements under this alternative would not interfere with public coastal access. The South Parcel Alternative would implement the proposed open space improvements in the COPR Expansion Area.

Table 6-4.
South Parcel Alternative Consistency with the Coastal Act

Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
30212. (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where 1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, 2) adequate access exists nearby, or 3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.	Continued public access between the coast and nearest public roadways, including between Phelps Road and Marymount Way on the North Campus, Devereux Road on the West Campus, and Camino Majorca along the eastern edge of the West Campus, would be provided under the South Parcel Alternative. Implementation of University policies regarding public access would restrict public access only when public access is inconsistent with the following: a) public health or safety; b) natural disaster, civil disorders which pose a threat to property, or other such seriously disruptive events; c) extraordinary measures, which are required to immediately avert, alleviate, or repair damage to campus property, or to maintain the orderly operation of the campus; military security needs; d) protection of fragile coastal resources; and e) adequate nearby access.
(b) For purposes of this section, "new development" does not include: (1) Replacement of any structure pursuant to the provisions of subdivision (g) of Section 30610. (2) The demolition and reconstruction of a single-family residence, provided that the reconstructed residence shall not exceed either the floor area, height, or bulk of the former structure by more than 10 percent, and that the reconstructed residence shall be sited in the same location on the affected property as the former structure. (3) Improvements to any structure which do not change the intensity of its use, which do not increase either the floor area, height, or bulk of the structure by more than 10 percent, which do not block or impede public access, and which do not result in a seaward encroachment by the structure. (4) The reconstruction or repair of any seawall, provided, however, that the reconstructed or repaired seawall is not seaward of the location of the former structure. (5) Any repair or maintenance activity for which the commission has determined, pursuant to Section 30610, that a coastal development	The South Parcel Alternative would include construction of new housing; therefore, this section is not applicable to this alternative.

Table 6-4.
South Parcel Alternative Consistency with the Coastal Act

Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
permit will be required unless the commission determines that the activity will have an adverse impact on lateral public access along the beach. As used in this subdivision, "bulk" means total interior cubic volume as measured from the exterior surface of the structure.	
(c) Nothing in this division shall restrict public access nor shall it excuse the performance of duties and responsibilities of public agencies which are required by Sections 66478.1 to 66478.14, inclusive, of the Government Code and by Section 4 of Article X of the California Constitution. Sections 66478.1 to 66478.14, inclusive, of the Government Code, are reproduced in following Table 6-1 (Land Use). Section 66478.1 declares the legislative intent for these sections of the Government Code, which are intended to implement Section 4 of Article X of the California Constitution insofar as Sections 66478.1 through 66478.10 are applicable to navigable waters. Section 66478.2 finds that the public natural resources of this state are limited in quantity, utilization of public natural resources will increase with population, and that real estate subdivisions may result in diminished public access to public natural resources. Section 66478.3 finds and declares that it is essential to the health and well-being of all citizens of this state that public access to public natural resources be increased and that it is the intent of the Legislature to increase public access to public natural resources. Sections 66478.4 to 66478.14 of the Government Code relate to the provision of public access when a local agency approves either a tentative or a final map of any proposed subdivision to be fronted upon a public waterway, river, or stream. Section 4 of Article X of the California Constitution states: "No individual, partnership, or corporation, claiming or possessing the frontage or tidal lands of a harbor, bay, inlet, estuary, or other navigable water in this	The South Parcel Alternative does not include the subdivision of any real property, and, therefore, Sections 66478.1 et. seq. are not applicable to this alternative.

Table 6-4.
South Parcel Alternative Consistency with the Coastal Act

Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
state, shall be permitted to exclude the right of way to such water whenever it is required for any public purpose, nor to destroy or obstruct the free navigation of such water; and the Legislature shall enact such laws as will give the most liberal construction to this provision, so that access to the navigable waters of this state shall be always attainable for the people thereof."	
30212.5. Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.	The closure of informal trails, trial improvements, and habitat restoration improvements as outlined under the proposed project would not occur with the South Parcel Alternative except in the COPR (including the Expansion Area). Housing development would be designed to protect sensitive resources to the greatest extent possible However, the South Parcel Alternative, therefore, does not achieve the same level of consistency with this section as the proposed project.
30213. Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred. The commission shall not: (1) require that overnight room rentals be fixed at an amount certain for any privately owned and operated hotel, motel, or other similar visitor-serving facility located on either public or private lands; or (2) establish or approve any method for the identification of low or moderate income persons for the purpose of determining eligibility for overnight room rentals in any such facilities.	The South Parcel Alternative would preserve some passive recreational opportunities within the Open Space Plan area, such as walking, jogging, bird and wildlife viewing, dog walking, and bicycle riding, which would have no cost. The Joint Proposal (and Open Space Plan) would not be implemented under this alternative. Existing uses of the project area that conflict with Coastal Act policies would continue, development would occur under existing approved plans, policies and regulations would occur. The most significant recreational opportunity presented by the Open Space Plan – the opportunity to preserve the unique and irreplaceable recreational opportunity of an unbroken natural open-space area consisting of 652 acres adjacent to the coast – would be lost to residents and visitors alike. The recreational experience of the area would be diminished and interrupted by the proximity of residential development and daily activity.
30214. (a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following: (1) Topographic and geologic site characteristics	The South Parcel Alternative's improvements to public access consider site-specific concerns in the Ellwood-Devereux area. The capacity of the site would be considered through use of the National Park Services VERP (or similar) framework, which considers ecological and social conditions, rather than specified numbers of persons. The South Parcel

Table 6-4.
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Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
(2) The capacity of the site to sustain use and at what level of intensity (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses (4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter	Alternative would include management actions to monitor conditions in the project area and implement the Carrying Capacity/VERP process. Public access is limited in areas of sensitive resources, including trails through the COPR and COPR Expansion Area, and snowy plover habitat along the beach. Residential units would be provided entirely on University land. However, trails would be provided along the perimeter and in common open space areas of proposed residential development to protect privacy of these residences. Collection of litter would be provided through implementation of MM 4.15-7, which requires inclusion of the project area under the University's jurisdiction in a solid waste reduction and recycling program. Through this program, recycling and trash bins would be provided, ensuring collection of litter. The Joint Proposal (and Open Space Plan) would not be implemented under this alternative. Without implementation of the Open Space Plan, existing uses of the project area that conflict with Coastal Act policies would continue, development would occur under existing approved plans, policies and regulations would occur. The most significant recreational opportunity presented by the Open Space Plan—the opportunity to preserve the unique and irreplaceable recreational opportunity of an unbroken natural open-space area consisting of 652 acres adjacent to the coast—would be lost to residents and visitors alike. The recreational experience of the area would be diminished and interrupted by the proximity of residential development and daily activity. Open space would be fragmented by development and create more difficult access limitations.
(b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.	The South Parcel Alternative would occur entirely on University land, and no public access would be granted or provided via any private property.

Table 6-4.
South Parcel Alternative Consistency with the Coastal Act

Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
(c) In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.	The South Parcel Alternative would not implement the Joint Proposal for the Elwood-Devereux area. The proposed project, as part of the initial "Joint Proposal" for the Ellwood-Devereux area, is one component of a planning process that has brought together the three agencies – the City of Goleta, County of Santa Barbara, and the University – that have jurisdiction over the area into a cooperative planning process designed to cluster development away from sensitive resources and preserve open space. As a cooperative effort overseen by the Joint Review Panel, the project itself represents an innovative planning effort, within which the issue of access management, among other issues, is addressed. The concept of the Joint Stewardship Task Force that would manage the open space and access to this area over the long term represents a continuation of the unique planning approach to the area.
Article 3: Recreation	
30220. Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.	The project area includes a sandy beach area (Sands Beach) that is suited for water-oriented recreational activities such as passive sunbathing, surfing, swimming, and surf fishing. The South Parcel Alternative does not propose any loss of these uses and would result in access and facilities improvements to enhance opportunities for use of the area.
30221. Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.	The South Parcel Alternative would preserve the West Campus Bluffs from development as a faculty housing site. Present and foreseeable future demand for public recreational activities would be provided for in the open space lands within the University's jurisdiction.
30222. – Private Lands	Not Applicable
30222.5. – Aquaculture	Not Applicable
30223. – Upland areas	Not Applicable
30224. – Recreational boating use of coastal waters	Not Applicable
Article 4: Marine Resources	
30230. Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special	The South Parcel Alternative does not propose any development directly in marine waters such as diking, dredging, or filling. Marine resources in the project

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Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.	area are affected by discharges from the Devereux Slough. Runoff from the South Parcel Alternative would not significantly affect water quality, as described in this section under Section 6.4.3.3, Hydrology and Water Quality. Runoff from this alternative would not significantly affect water quality, as described under Impact 4.3-1, 4.3-3, 4.3-4, and 4.3-7 in the Hydrology and Water Quality (Section 4.3) of this EIR. Surface runoff from areas of proposed development would be discharged through filtration systems to capture sediment and other contaminants, and directed through wetland areas prior to entering drainages upstream from Devereux Slough. Through alternative project components and implementation of mitigation measures, marine resources would be enhanced and maintained.
30231. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.	The biological productivity and quality of the marine environment within and affected by the project area would be restored, enhanced, and maintained. These resources in the project area include coastal waters, Devereux Slough, Devereux Creek and its associated tributaries, and various wetlands throughout the site. The Hydrology and Water Quality Section 6.4.3.3 of the South Parcel Alternative analysis in this chapter analyze in detail the impacts to hydrology, water quality, and biological resources. This section concludes that all impacts to these resources can be reduced to less-than-significant levels. Included among the means for maintaining and restoring these resources are restoration activities and erosion controls, the directing of runoff from residential areas through filtration systems to capture sediment and other contaminants, and wetland areas that would control runoff, promote groundwater infiltration, and ensure the maintenance of a natural vegetation buffer. No alteration of natural streams is proposed. The South Parcel Alternative would use reclaimed water where feasible (where runoff from reclaimed water use in landscaping would not adversely affect nearby wetlands and sensitive habitat areas).

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30232. Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.	The South Parcel Alternative does not propose any changes to the operation or use of facilities associated with the EMT. Consequently, existing programs protecting against spills and programs identifying effective containment and cleanup procedures for accidental spill of substances associated with the facility would remain in effect. No development or transportation of crude oil, gas, petroleum products, or hazardous substances is proposed.
30233. (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following: (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities. (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps. (3) In wetland areas only, entrance channels for new or expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities shall not exceed 25 percent of the degraded wetland. (4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.	The South Parcel Alternative would not result in direct loss of any wetlands. Vernal pools, wetlands and other riparian vegetation areas on the South Parcel and North Parcel would remain.

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(5) Incidental public service purposes, including, but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines. (6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas. (7) Restoration purposes. (8) Nature study, aquaculture, or similar resource-dependent activities.	
(b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for such purposes to appropriate beaches or into suitable longshore current systems.	The South Parcel Alternative would remediate erosion and implement erosion controls that will mitigate future sedimentation resulting from existing conditions and uses. The South Parcel Alternative would not result in any dredging or the deposition of spoils.
(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including, but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California," shall be limited to very minor incidental public facilities, restorative measures, nature study, commercial fishing facilities in Bodega Bay, and development in already developed parts of south San Diego Bay, if otherwise in accordance with this division. For the purposes of this section, "commercial fishing facilities in Bodega Bay" means that not less than 80 percent of all boating facilities proposed to be developed or improved, where such improvement would create additional berths in Bodega Bay, shall be designed and used for commercial fishing activities.	The South Parcel contains two vernal pools totaling approximately 0.3 acre of ESH designated habitat. These areas are outside the residential development footprint and no impacts from habitat removal would occur. Under this alternative no direct removal of vernal pools would occur. Indirect impacts to vernal pools could include disturbance from recreational use of open space areas, changes to site topography that disrupt the vernal pool water supply, or erosion of adjacent uplands that causes siltation of the pools. Under this alternative, the University would implement MM 4.4-1(l) and MM 4.4-1(k) (construction management techniques to protect sensitive species). With implementation of the identified Mitigation Measures, this impact would be reduced to a less-than-significant level. Although residential development would occur over a larger area, no direct impacts vernal pools would occur under this alternative. The Storke-Whittier South Parcel contains 0.19 acre of Coastal Act wetlands and 0.12 acre of ACOE wetlands (at the southern edge of the driving range). These areas are outside the residential development footprint and no impacts from habitat removal would occur. A total of 2.93 acres of Coastal Act wetlands and 0.19 acres of ACOE wetlands have been identified in the South Parcel. None of these wetlands, or the 100-foot

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	buffer zone around these wetlands would be within the development footprint, and no direct impacts would occur. In summary, the South Parcel Alternative would result in no direct loss of wetlands. With respect to potential indirect or construction impacts, the University would obtain appropriate permits for any grading or construction that may impact riparian area, stream channel, or wetland, and would implement Mitigation Measure 4.4-2(d) (restoration plan for wetlands and environmentally sensitive habitats), and MM 4.4-1(k) and MM 4.4-1(l) (construction management techniques for sensitive species). With implementation of the identified Mitigation Measures, this impact would be reduced to a less-than-significant level.
(d) Erosion control and flood control facilities constructed on watercourses can impede the movement of sediment and nutrients which would otherwise be carried by storm runoff into coastal waters. To facilitate the continued delivery of these sediments to the littoral zone, whenever feasible, the material removed from these facilities may be placed at appropriate points on the shoreline in accordance with other applicable provisions of this division, where feasible mitigation measures have been provided to minimize adverse environmental effects. Aspects that shall be considered before issuing a coastal development permit for such purposes are the method of placement, time of year of placement, and sensitivity of the placement area.	The South Parcel Alternative would install a new culvert on Devereux Creek to improve flood protection. The proposed modifications would include replacement of existing twin 24-inch drainage pipes with a larger ~~box~~ culvert. ~~No changes to the existing natural channel bottom would be retained,~~ The culvert would thus permit~~ting~~ the continued delivery of sediments from upstream areas to the littoral zone via the Devereux Slough.
30234. Commercial fishing and recreational boating industries	No commercial fishing or recreational boating industries would be affected by this alterative, and this section is not applicable to the South Parcel Alternative.
30234.5. The economic, commercial, and recreational importance of fishing activities shall be recognized and protected.	The South Parcel Alternative would improve coastal access via trail improvements and beach access improvements that may expand recreational fishing opportunities along the adjacent coastline.

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30235. Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fishkills should be phased out or upgraded where feasible.	The South Parcel Alternative would not result in any revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, or other such construction that alters natural shoreline processes.
30236. Dams or other substantial alterations of rivers and streams	Not Applicable
30237. Bolsa Chica wetlands	Not Applicable
Article 5: Land Resources	
30240. (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.	The South Parcel Alternative would not result in the direct loss wetlands or environmentally sensitive habitat areas. However, The South Parcel Alternative removes the opportunity to consolidate and permanently preserve the lower Devereux Creek watershed, also known as the greater Devereux Slough regional ecosystem.
(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.	The South Parcel Alternative has been sited and designed to prevent impacts from residential development to environmentally sensitive habitat areas. As discussed in Section 6.4.3.4 (Biological Resources), the South Parcel Alternative would result in a less-than-significant impact to environmentally sensitive habitat areas, including wetlands.
30241 – Prime agricultural land	Not Applicable
30241.5 – Existing agricultural uses.	Not Applicable
30242 – Lands suitable for agricultural use	Not Applicable
30243 – Productivity of soils and timberlands	Not Applicable

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Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
30244. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.	The South Parcel Alternative would implement a range of mitigation measures related to protection of known archaeological or paleontological resources, and procedures when unknown resources are encountered during construction, restoration, or management activities.
Article 6: Development	
30250. (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.	Although development under the South Parcel alternatives would avoid wetlands and environmentally sensitive habitat areas, the South Parcel Alternative would result in development that is not contiguous with existing developed areas, As described in Section 6.4.3.15 (Public Services and Utilities) of this EIR, public services and utilities would be available to serve the South Parcel Alternative without significant environmental effects, with implementation of Mitigation Measures identified in this EIR. The South Parcel Alternative would result in development on 40 acres of the South Parcel, 10.7 acres on the Storke-Whittier site, plus another 2.8 acres adjacent to the West Campus Family Student Housing complex. Development of the faculty housing would be compatible with the density of between 6.5 units per acre and 12 units per acre on surrounding parcels. Development of the Storke-Whittier family student housing would result in an overall density compatible with the density of 18 units per acre at the adjacent Married Student Housing.
(b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.	The South Parcel Alternative does not include any hazardous industrial development.
(c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.	The South Parcel Alternative does not include any visitor-serving facilities.
30251. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to	Consistent with LRDP policy 30251.5, development of new housing would generally be compatible in scale and character with existing housing in the area and would entail clustered development. Alteration of natural landforms would not be minimized by developing faculty housing on the South Parcel, which is characterized by substantial topographic variation, including heights of some

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restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.	landforms that exceed the maximum heights of the proposed residential structures. Consistent with LRDP policy 30253.3, no development is planned on the bluff face, except for staircases and access ways to provide public beach access. Views of the Santa Ynez Mountains (inland of the project site) from the prominent topographic features on the project site would remain dominant over adjacent development. This alternative would develop residential structures up to 35 feet in height, consistent with LRDP policies 30251.6 and 30251.6(b). Development of residential structures would block, or eliminate views of the golf course and undeveloped lands from some streets, but scenic vistas would not be interrupted. Development on the Storke-Whittier property would occur inland of existing family student housing development and would be of a similar scale; consequently, no significant effect on coastal visual resources would occur. However, under the South Parcel Alternative, the Joint Proposal (and Open Space Plan) would not be implemented under this alternative. Without implementation of the Joint Proposal and Open Space Plan, existing uses of the project area that diminish scenic and visual qualities of the Coastal Area continue. The most significant scenic and visual opportunity presented by the Open Space Plan – the opportunity to preserve an unbroken natural open-space area consisting of 652 acres adjacent to the coast – would not be realized. The scenic and visual qualities of the area would be diminished and interrupted by the proximity of residential development and daily activity. Under the South Parcel Alternative, an island of development would occur in the unbroken natural open-space area, which would diminish the visual and scenic quality of the area.

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Coastal Policies	South Parcel Alternative's Consistency with Coastal Policies
30252. The location and amount of new development should maintain and enhance public access to the coast by 1) facilitating the provision or extension of transit service, 2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, 3) providing nonautomobile circulation within the development, 4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, 5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by 6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of on-site recreational facilities to serve the new development.	The faculty housing and family student housing would include recreational uses on site, and residents would have access to campus recreational facilities, which would meet the needs of new residents and ensure adjacent coastal recreation areas are not overloaded.
30253. New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.	As described in Section 6.4.3.2, Geology and Geologic Hazards, Impact 4.2-1, all mitigation measures related to geologic safety and stability would be implemented, and the South Parcel Alternative would be required to comply with all applicable laws and regulations pertaining to geologic and seismic hazards, including the California Building Code and University Policy on Seismic Safety. Consistency with these laws and regulations would ensure that site planning and building design minimize geologic and seismic risks to within acceptable levels. As described in Section 6.4.3.3, Hydrology and Water Quality, Impact 4.3-10, some development would occur within a 100-year flood zone; however, the analysis concluded that with implementation of proposed drainage improvements, structures would be designed to avoid significant risks associated with flooding. As described in Section 6.4.3.5, Hazards and Hazardous Materials, Impact 4.5-10, residential development would be adjacent to some areas with potentially high fuel loads. Implementation of fuel modification guidelines and access improvements in the open space area would improve access to suppress fires, if one were to occur. With implementation of Mitigation Measures, risks from fire hazards would be minimized.

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(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.	This alternative includes restoration of eroded area and remediation of erosion problems. In addition, as described in Section 6.4.3.2, Geology and Geologic Hazards, Impact 4.2-2, erosional impacts during construction activities would be reduced to less-than-significant levels with the implementation of Mitigation Measures. Geologic instability issues are related to bluff retreat on the West Campus Mesa and at Coal Oil Point. The project does not propose any structural development in this area. Ground disturbance in this area would be limited to trail improvements to within the Draft Management Plan for the COPR. Management actions such as the consideration of the siting of the bluff top trail with respect to the bluff edge are proposed in order to ensure that implementation of these improvements would not result in geologic instability. Protective devices that would substantially alter natural landforms along bluffs would neither be necessary, nor are they proposed.
(3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development.	Construction and operation of the South Parcel Alternative would comply with the applicable requirements of the SBAPCD, as discussed more fully in Section 4.14 (Air Quality).
(4) Minimize energy consumption and vehicle miles traveled.	Through the siting of faculty and student housing at locations proximate to the campus, the length of daily vehicle trips would be reduced, as faculty and/or students would otherwise need to relocate at distances further from the campus. The provision of bicycle trail connections to portions of the campus would also encourage alternative transportation and reduce vehicle trips. The availability of regular transit between the residential sites and the Main Campus would also reduce vehicle trips generated by this alternative. Finally, as described in Sections 6.4.3.14 (Air Quality) and 6.4.3.15 (Public Services and Utilities), the campus would implement Mitigation Measures and State laws related to energy conservation, including compliance with Title 24 requirements and other energy conservation measures.

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(5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.	The South Parcel Alternative would result in the expansion of the COPR by 40 acres, which would protect the resources of this area. However, the Joint Proposal (and Open Space Plan) would not be implemented under this alternative. The opportunity to preserve the unique and irreplaceable recreational opportunity of an unbroken natural open-space area consisting of 652 acres adjacent to the coast – would be lost. The recreational experience of the area, which is a popular visitor destination point, would be diminished and interrupted by the proximity of residential development and daily activity.
30254. – Public works facilities	Not Applicable
30254.5. Notwithstanding any other provision of law, the commission may not impose any term or condition on the development of any sewage treatment plant which is applicable to any future development that the commission finds can be accommodated by that plant consistent with this division. Nothing in this section modifies the provisions and requirements of Sections 30254 and 30412.	The South Parcel Alternative does not include a sewage treatment plant or indirectly require any upgrade of a sewage treatment plant serving the project area.
30255. Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.	Development on the South Parcel would avoid construction on wetland areas and no wetland filling would occur on the South Parcel.
Article 7: Industrial Development	The South Parcel Alternative does not include any industrial development. Therefore the policies identified in this article are not applicable to this alternative.

Compatibility Analysis: The South Parcel Alternative proposes a total of 358 units, which falls within the previously identified maximum buildout of 403 units for the area (formerly referred to as the West Devereux Specific Plan area) in the Goleta Community Plan. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.1. This development standard applies to retaining the golf course in its present use, rather than residential, and requires a transfer of development credits for any use other than golf course or for open space, habitat restoration, and other passive public open space uses.

Compatibility Analysis: The South Parcel Alternative would not affect the land use designation on the Ocean Meadows Golf Course. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.2. A maximum of up to 122 units may be constructed south of the existing golf course.

Compatibility Analysis: The South Parcel Alternative proposes development of 207 dwelling units south of the golf course, which would exceed the designated level of development. However, the alternative limits the footprint of development to 40 of the 68.7 acres on the South Parcel; whereas the GCP permits development over a larger area on the South Parcel, as indicated in Figure 11 of the GCP. Thus, although more than 122 units would be developed, a smaller area of the South Parcel would be utilized for development and more of the South Parcel would be preserved and restored than under the Goleta Community Plan.~~***Not compatible with Plan.***~~

GCP – DevStd LUDS-GV-2.3. This standard requires the University to coordinate its site planning with the County for the West Devereux Specific Plan area so as to be consistent, to the fullest extent feasible, with the Santa Barbara coastal program, as required by Public Resource Code §30605. This coordination shall include planning for the location of roads and structures and indicate the amount and location of open space for habitat preservation and design of public trails.

Compatibility Analysis: The South Parcel Alternative would require amendment of the University's LRDP, and therefore is not within the jurisdiction of the County of Santa Barbara. As a land use plan amendment to the LRDP, this alternative proposes land use designations and implementing standards similar to, but would supersede, any existing LCP that applies to the site. This alternative includes the approximate location of roads, open space, trails, and parking, per the development standard. The University is a participant on the Joint Review Panel (JRP), which is composed of representatives from the University, City of Goleta, and County of Santa Barbara. Through the JRP, development and management of the Ellwood-Devereux Coast, including planning of the area under the University's jurisdiction would be coordinated among the relevant agencies for the area. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.4. This standard requires that all new residential development shall be confined to those areas primarily north of the existing Venoco Access Road. Vehicular

access to residential areas south of the golf course shall be from Phelps Road. The design of this access road shall be coordinated with that for any development on the Ellwood Beach-Santa Barbara Shores Specific Plan area to the west.

Compatibility Analysis: The South Parcel Alternative locates all development north of the existing Venoco Access Road, with vehicular access provided via Storke Road. Although provision of access via the Venoco Access Road would minimize affects associated with development of new roads, the proposed access route would not be provided via Phelps Road. ***Not compatible with Plan.***

GCP – DevStd LUDS-GV-2.5. A maximum of 409 residential units may be constructed within the Specific Plan boundaries, with a minimum of 25 percent to be affordable to persons of low or moderate income consistent with the policies of the County's Housing Element.

Compatibility Analysis: The South Parcel Alternative would result in the development of a total of 358 residential units. The Project is an amendment to the University's LRDP, hence, not subject to the County of Santa Barbara's Housing Element. This alternative would provide housing for faculty and students with families and are anticipated to fall within the range for low to moderate income housing prices in the area. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.6. A minimum of 50 percent of the site (exclusive of the existing golf course and the areas developed with oil facilities) shall be retained in public and common open space. At a minimum, areas dedicated as public open space shall include the dry sandy beach, the dune and back dune area extending between the University preserve to the east and the Ellwood Beach parcel to the west, and appropriate areas along the proposed trail system.

Compatibility Analysis: The South Parcel Alternative designates approximately 94.7 acres, or 89 percent of the North Campus, as open space, including the 40-acre COPR Expansion Area, the 26.6-acre North Parcel, and approximately 26.8 acres of the South Parcel. This total does not include the 17.5-acre EMT (which will become open space following the expiration of the Venoco lease in 2016), or undeveloped portions of the Storke-Whittier Parcel. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.7. This standard required the preparation of a habitat and open space management plan, coordinated with interested agencies, (e.g., the University, California Department of Fish and Game, RWQCB, Coastal Commission) prior to the processing of any residential development applications. Specifications for the plan include long term management and enhancement of the site's open space and design of a trail system. This plan should be created to complement and coordinate with other appropriate management practices in the adjacent University Preserve, or that may occur as a result of development on the Southwest Diversified/Santa Barbara Shores property, or as part of the overall Management Plan for a Devereux Slough Ecological Preserve.

Compatibility Analysis: Under the South Parcel Alternative, the University would not proceed with implementation of Open Space Plan, and would instead identify undeveloped areas as open space and not pursue preservation or restoration of those areas. ***Not compatible with Plan.***

GCP – DevStd LUDS-GV-2.8. Attractive fencing around the dune area shall be provided to restrict horses, ORVs, and mountain bikes. Signs shall also be posted informing the public of the fragility of the area and requesting that they keep off the dunes.

Compatibility Analysis: The South Parcel Alternative, per the COPR Management Plan, would continue to fence sensitive dune and back dune areas and plover roosting and nesting areas and signage as appropriate. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.9. This standard requires the development of an informal trail system that uses the existing trails system and is consistent with the protection of Environmentally Sensitive Habitat (ESH) areas and the recommendations of the Habitat and Open Space Management Plan. At a minimum, this trail system shall provide for access to the site and through the site to the beach from both Phelps and Storke Roads, with a small parking area for twenty cars provided off Phelps Road near the northwest corner of the site. The design of this trail system shall be coordinated with that of Ellwood Beach to the west, to assure that at least one continuous trail links the properties. A revegetated drainage course and open space buffer, which could include the existing ephemeral drainage and/or other physical access restrictions (e.g., walls, fences, etc.), consistent with the recommendations of the Open Space and Habitat Management Plan, shall be provided along the southern boundary of the area developed in residential uses in order to direct public access onto the trail system and limit other impacts of residential development on ESH areas.

Compatibility Analysis: The South Parcel Alternative would retain existing trails on the North Parcel, around the perimeter of the South Parcel, and around the perimeter of the COPR, to protect sensitive habitat, including ESHAs. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.10. To the maximum extent feasible, vegetation consisting of drought tolerant and other native species shall be used for landscaping to screen development from public use areas and to create a buffer from ESH areas. Landscaping shall be designed to complement, enhance, and restore native habitats on site.

Compatibility Analysis: MM 4.4-2(b) requires the use of native plant species in all open space areas outside the designated development areas, and the use of native species and other drought tolerant species as much as feasible within the development areas. MM 4.9-3(h) also requires the use of native plantings to screen development from the two public access corridors along the western boundary of the site and along the existing Venoco Access Road. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.11. This standard requires the installation and maintenance of public improvements for a period of at least five years.

Compatibility Analysis: This development standard was originally formulated to ensure that private developers would implement required public improvements and mitigation measures. The University, which operates as an independent jurisdiction, does not provide performance

securities to other jurisdictions to ensure compliance with mitigation requirements. The Mitigation Monitoring and Reporting Program would monitor and track implementation of Mitigation Measures. This development standard is not relevant to the South Parcel Alternative.

GCP – DevStd LUDS-GV-2.12. Natural building materials and colors compatible with the surrounding terrain shall be utilized on all exterior surfaces of all structures, including fences.

Compatibility Analysis: Under this Alternative, the University would continue the campus practice to use building materials and colors that are compatible with the surrounding landscape. Natural building materials are recommended where practical. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.13. The West Devereux Specific Plan shall provide for a minimum 200 foot buffer between the north side of the existing Venoco access road traversing the property and any permitted development north of the access road; this buffer shall be maintained in open space, and shall be revegetated with appropriate native plant species. Additionally, this standard requires that the riparian habitat along Devereux Creek within the Ocean Meadows Golf Course shall be restored as part of the development of either the Ocean Meadows Golf Course or the development of the University's North Campus parcel.

Compatibility Analysis: The South Parcel Alternative proposes development on approximately 40 acres of the South Parcel, which would include a setback of less than 200 feet in some areas, and greater than 200 feet in other areas, so that no impacts to wetlands would occur. Residential development on the South Parcel would include appropriate native plant materials along the Venoco Access Road in those areas adjacent to residential development and would preserve existing vegetation along the western portions of the road. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.14. The EMT facilities shall be removed upon termination of the current operation and the natural habitat values of the site shall be restored to a condition approximating those which existed prior to the initial construction of the facilities.

Compatibility Analysis: Per the existing LRDP, upon termination of the current lease at the EMT in 2016, the area will revert to open space. Per lease conditions, the site will be restored to a condition approximating its natural condition. ***Compatible with Plan.***

GCP – DevStd LUDS-GV-2.15. This standard requires coordination between the planning efforts for the West Devereux Specific Plan area with the Santa Barbara Shores/Ellwood Beach area to ensure maximum protection of Devereux Creek, the Devereux Slough, and the adjacent upland and marine habitats.

Compatibility Analysis: Under this alternative, the Open Space Plan would not be implemented on lands within the University's jurisdiction. The University would continue to coordinate future development with adjacent jurisdictions to the whenever feasible. ***Compatible with Plan.***

Santa Barbara County Association of Governments, Regional Growth Forecast 2000

The SBCAG published a Regional Growth Forecast in 2001, and adopted the report February 21, 2002. The RGF analyzes growth expectations and trends from 2000-2030 for population growth, employment, and housing. The report makes a set of nine recommended policies. While these policies have not been formally adopted, the University considers project compatibility with the relevant policies that were recommended in the RGF document. Three of the nine policies apply to the project, and are analyzed as follows:

RGF – Recommended Policy 5. *The Cities of Santa Barbara and Carpinteria, UCSB, and the County should continue to address the regional implications of additional employment in the South Coast area on the regional housing market and cities in the South Coast and north county area. The region needs to examine the impacts of high housing costs and aging workforce on the ability to sustain employment growth and accommodate increasing long distance commutes.*

Compatibility Analysis: This policy is addressed by the South Parcel Alternative, which would provide housing for faculty and married students. The University faces increasing difficulty in recruiting competitive faculty and graduate students because of housing availability and prohibitive cost. This alternative would partially alleviate local demand for housing by existing and to-be-hired faculty, and students with families. ***Compatible with Plan.***

RGF – Recommended Policy 6. *Due to the long term jobs-housing imbalance local and state jurisdictions in the South Coast should consider concurrent phasing of new commercial, retail, industrial development with residential development to be consistent with a balance of jobs and housing.*

Compatibility Analysis: The University will be hiring additional faculty over the next decade, mainly to replace retiring faculty most of whom are expected to remain in the area. This alternative addresses the need for additional housing to balance jobs. ***Compatible with Plan.***

RGF – Recommended Policy 8. *Local agencies are encouraged to use techniques to improve inter-jurisdictional coordination. Such techniques may include, but are not limited to joint city-county planning commission meetings, joint city-county specific plans, and regular referral of environmental reports and plans to adjoining agencies.*

Compatibility Analysis: The University has worked with adjacent jurisdictions to coordinate development would continue to do so under this alternative. ***Compatible with Plan.***

Santa Barbara County Air Pollution Control District, Revised 2001 Clean Air Plan

The SBCAPCD is directly responsible for regulating local sources of air pollution within Santa Barbara County. It has responded to this requirement by preparing a series of Clean Air Plans (CAPs). The most recent of these, the Revised 2001 CAP, was prepared in conjunction with the SBCAG, and was adopted by the Governing Board of the SBCAPCD on December 19, 2002.

One measurement tool to determine a project's consistency with the CAP is to consider how a project accommodates the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the project and the community in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project would be consistent with the goals and policies of the CAP.

The housing components of the South Parcel Alternative represent an opportunity to contribute to the fulfillment of the CAP goals. Through providing faculty and student housing on the North campus, within shuttle bus, walking, or bicycling distance to classes and academic offices and laboratories, the project could result in a reduction of Vehicle Miles Traveled (VMT) and thus a reduction in mobile source emissions. Because VMT could be reduced as a result of this alternative, development of this alternative could result in a better air quality outcome than if the alternative were not to be implemented. The University encourages accommodation and use of other transit modes, including bicycles, and provides a campus shuttle bus line that will be extended to the proposed faculty housing and family student housing, to further reduce emissions. These campus policies are consistent with the goals of the CAP for reducing the emissions associated with new development. The South Parcel Alternative would be consistent with the Revised 2001 CAP.

Regional Water Quality Control Board, Water Quality Control Plan (Central Coast Basin Plan)

Consistency with the Clean Water Act (CWA) is demonstrated through compliance with the National Pollutant Discharge Elimination System (NPDES) permit process (Phase I and Phase II), as well as all regulations promulgated by the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs).

The University is required to comply with all applicable water quality requirements established by the Central Coast RWQCB and SWRCB. In addition, implementation of this alternative would be in accordance with the NPDES permit process, as described below. Thus, point and nonpoint source discharges would be regulated by the appropriate NPDES permits, and the beneficial uses of the surface water and groundwater basin would be maintained. Therefore, implementation of the South Parcel Alternative would be consistent with the Basin Plan and the Porter-Cologne Water Quality Control Act (which establishes the State Water Resources Control Board and each RWQCB as the principal State agencies for having primary responsibility in coordinating and controlling water quality in California).

Under this alternative, the University would obtain NPDES construction permits for all applicable elements of this alternative. In addition, the University would continue to implement the applicable provision of the Storm Water Management Program. These would include implementation of BMPs, as discussed in Chapter 4.3 Hydrology.

The South Parcel Alternative is consistent with the Central Coast Basin Plan, the NPDES Program, and all other relevant regulations promulgated by the SWRCB and the Central Coast RWQCB, similar to the proposed project.

Airport Land Use Plan

As discussed in the setting, to ensure public safety and land use compatibility between a Santa Barbara County airport and the surrounding areas, the Santa Barbara County Airport Land Use Plan imposes land use restrictions on defined areas adjacent to airports. None of the proposed residential development under this alternative would be within ALUP's Safety Area 2 (Approach Zone). Thus, this alternative would be consistent with the Airport Land Use Plan and this impact would be *less than significant*. As this alternative would not be inconsistent with the Airport Land Use Plan, this impact would be less than the project.

Similar to the proposed project, the South Parcel is not covered by any applicable habitat conservation plan or natural community conservation plan, therefore the alternative would not be in conflict with such plan, and no impact would occur.

Overall, this alternative would be consistent with the Regional Growth Forecast, the Clean Air Plan, the Central Coast Basin Plan, and Airport Land Use Plan. This alternative would be ~~generally consistent~~ largely compatible with provision of the Goleta Community Plan, however since the University is not subject to this plan, despite any inconsistencies, this impact would be *less than significant*. ~~As more incompatibilities with the GCP would occur under this alternative, this impact would greater than the proposed project.~~

6.4.2.7 Agricultural Resources

As noted in Section 4.7 (Agricultural Resources), the Initial Study included in the Notice of Preparation for the proposed project, no portion of the project area under the University's jurisdiction is considered Prime Farmland, or Farmland of Statewide Importance. In addition, no portions of the site are zoned for agricultural use or are covered by a Williamson Act contract. Thus, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur under either the proposed project or any alternative to the project. No conflict with agricultural zoning or a Williamson Act contract would occur. As no impacts to farmland would occur, an alternative to the proposed project would also not result in other changes to the environment that could result in the conversion of farmland to other nonagricultural use.

6.4.2.8 Mineral Resources

Impact 4.9-1. Implementation of the South Parcel Alternative would not result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state. This impact would be *less than significant*.

For the Storke-Whittier Parcel, no known economically recoverable mineral resources are located within the areas of proposed residential development. Historically, oil and gas operations

have occurred in the South Parcel and other areas under the University's jurisdiction; however, these operations are now conducted from an offshore location. Residential development would not interfere with existing oil recovery operation and this impact would be *less than significant*. Although a greater area would be subject to residential development under this alternative, access to mineral resources in the project area, if any, would be comparable to the proposed project.

Impact 4.8-2. Implementation of the South Parcel Alternative not result in loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. This impact would be *less than significant*.

No mineral resource recovery sites are delineated in the General Plan for the County or the Goleta Community Plan (prepared by the County), which covers the project area. As noted above, residential development, minor open space improvements, and management of habitat areas would not interfere with existing oil recovery operations, which are conducted from an offshore location. This impact would be *less than significant*. Although a greater area would be subject to this development under this alternative, access to mineral resources in the project area, if any, would be comparable to the proposed project.

6.4.2.9 Visual Resources

Impact 4.9-1. Implementation of the South Parcel Alternative would not have a substantial adverse effect on a scenic vista. This impact would be *less than significant*.

The methodology for evaluation of visual resource impacts included identification of key observation points for the South Parcel Alternative as well as visual simulations of the proposed structures on the South Parcel. Figure 6-2 identifies the key observation points utilized in this analysis, as follows:

Key Observation Point U-7. View northwest from DeAnza Trail/Bikeway at the EMT towards the South Parcel. Typical viewers are recreational users on the DeAnza Trail/Bikeway or in the adjacent open space south of the DeAnza Trail/Bikeway.

Key Observation Point U-8. View northwest from the intersection of the DeAnza Trail/ Bikeway and the Slough to Dunes Trail towards the South Parcel. Typical viewers are recreational users on the DeAnza Trail/Bikeway or on trails in the adjacent open space south of the DeAnza Trail/Bikeway.

Figures 6-3 and 6-4 provide before and after photographs with a visual simulation depicting the proposed structure mass as well as roof heights for development of faculty housing on the South Parcel. Refer also to Figures 4.9-5 through 4.9-7 (Section 4.9, Visual Resources), for visual simulations of the Sierra Madre Family Student Housing on the Storke-Whittier Parcel.

This alternative would develop residential structures on the South Parcel and the Storke-Whittier Parcel up to 35 feet in height. These proposed structures could have the potential to block

scenic vistas from adjacent locations, as discussed in more detail below (refer to Figures 6-3 and 6-4). Continued management of the COPR would not block or otherwise substantially interfere with any scenic vistas.

Depending on the precise location of the residential structures and the viewer, intermittent views of distant trees and undeveloped areas may be available, but most views across the North Parcel from these locations would be blocked. However, these views are on-campus views and do not constitute a scenic vista as defined in Section 4.9.2.3, and this impact would be less than significant. As demonstrated by Figures 6-3 and 6-4, long-range views of the Santa Ynez Mountains, which are currently available along the southern perimeter of the North Parcel, including the adjacent portions of the Ocean Meadows Golf Course, would not be blocked from either the South Parcel. The loss of any views across the North Parcel, including the loss of views of undeveloped areas and of the Santa Ynez Mountains, would not represent a substantial adverse effect on a scenic vista, as they are not publicly held views.

Development of the student family housing component of this alternative on the Storke-Whittier Parcel would not block other views of scenic vistas would (as illustrated by Figures 4.9-5 through 4.9-7).

Relative to focal views, there are no public outdoor art spaces on the North or West Campus. Significant stands of trees that acted as windrows related to historic use of the property as a ranch predate the campus' acquisition of the land. Implementation of MM 4.9-3(a) would ensure preservation of existing native trees to the maximum extent feasible. The only historic building on campus is a barn, which is visible from some locations of the West Campus Mesa, but views of this structure would not be affected by any development or open area improvements. The Devereux Slough can also be considered a scenic feature of the campus. Views of the Slough would not be affected by development under this alternative. Comparable to the proposed project, the South Parcel Alternative would result in a *less-than-significant* impact with respect to scenic vistas.

Impact 4.9-2. Implementation of the South Parcel Alternative would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. *No impact* would result.

The UCSB North and West Campuses are located approximately 0.5 miles south of the SR-101 freeway, and generally bounded by Storke Road, Whittier Drive, Marymount Way, and Phelps Road, none of which are officially designated or identified as eligible for designation as a state scenic highway (California Department of Transportation, Office of State Landscape Architecture, California Scenic Routes 2003). Although less residential development and fewer open space improvements would occur under this alternative, this impact would be comparable to the proposed project.

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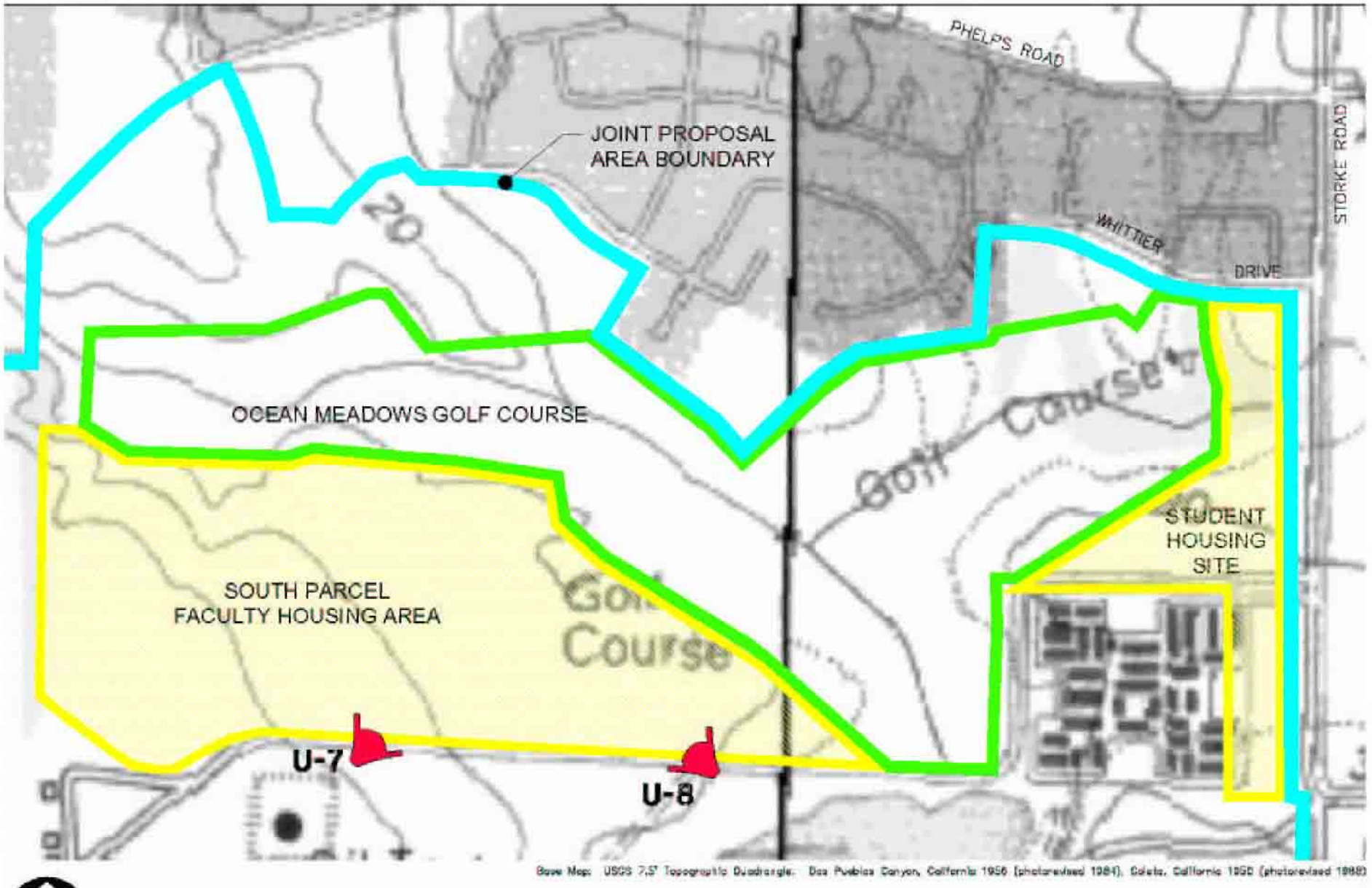

UCSB	Faculty and Family Student Housing, Open Space Plan & LRDP Amendment EIR **University of California, Santa Barbara**	Figure 6-2. Key Observation Points Alternative 1	April 2004

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Photo 7A

Photo 7B

Photo 7A Existing site conditions
Photo 7B Project roof line simulation

UCSB	Faculty and Family Student Housing, Open Space Plan & LRDP Amendment EIR **University of California, Santa Barbara**	Figure 6-3. Key Observation Point U-7	April 2004

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Photo 8A

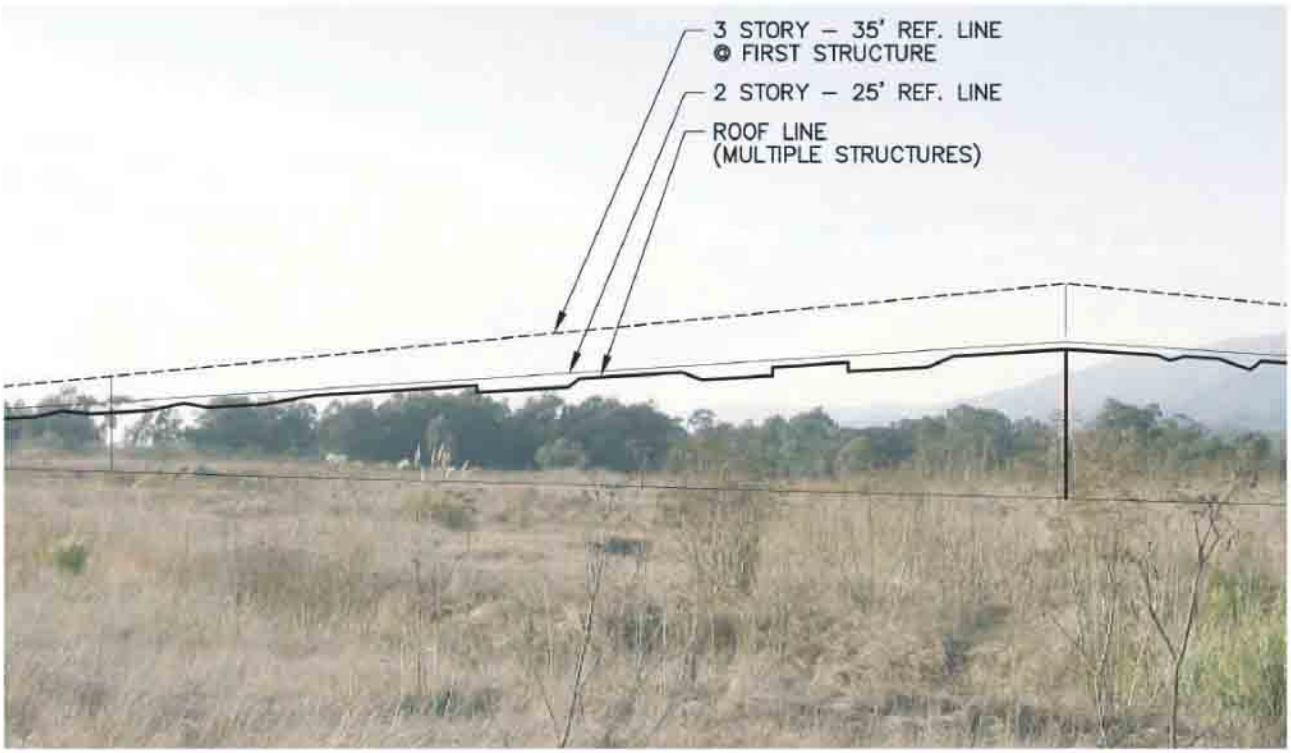

Photo 8B

Photo 8A Existing site conditions
Photo 8B Project roof line simulation

UCSB	Faculty and Family Student Housing, Open Space Plan & LRDP Amendment EIR **University of California, Santa Barbara**	Figure 6-4. Key Observation Point U-8	April 2004

Impact 4.9-3. Implementation of the South Parcel Alternative could substantially degrade the visual character or quality of the South Parcel and the immediate surrounding area. This impact would be *significant and unavoidable.*

Development of residential structures on the South Parcel and Storke-Whittier Parcel would result in the conversion of an undeveloped area into the site of permanent residential structures, with parking integrated into, or adjacent to, the housing structures. As the proposed Storke-Whittier residential development is contiguous to adjacent residential land uses (e.g., housing north of Whittier Drive, and east of Storke Road, and the existing West Campus Family Student Housing complex), development of the family student housing would be generally compatible with existing housing in the area and would occur as clustered development.

Development of faculty housing would result in development on approximately 40 acres of the South Parcel in an undeveloped area that is not adjacent to any other development. This would represent a substantial degradation in the visual character or quality of the South Parcel and the immediate surrounding area. Adherence to MM 4.9-3(a) through 4.9-3(h) would reduce, but not eliminate, the potentially adverse impacts related to the change in visual character. As no feasible mitigation measures are available to offset this impact, this impact would be *significant and unavoidable*. As the South Parcel alternative would introduce an island of development in the midst of an unbroken natural area, while the proposed project would cluster development adjacent to existing developed areas, potential impacts would be greater than the proposed project

Impact 4.9-4. Development of the South Parcel Alternative could create new sources of substantial light or glare in the project area or vicinity that would adversely affect day or nighttime views from adjacent land uses. Although less residential development would occur under this alternative, due to the siting of faculty housing on the South Parcel (over a larger area that the proposed project), potential impacts would be greater than the proposed project. With the inclusion of identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

In conjunction with residential development and management of the COPR, the campus would implement MM 4.9-4(a) and (b), which require that new lighting on the West Campus shall be kept at the minimum level which strikes a balance between safety and habitat protection and shall be designed to avoid glare into adjacent properties.

6.4.2.10 Recreation

Impact 4.10-1. Implementation of the South Parcel Alternative could incrementally increase recreational use of the open space under UCSB jurisdiction, and such an increase could result in accelerated deterioration of the open space areas on the North and West Campuses. As this alternative would not implement the same degree of management of open space areas, potential impacts would be greater than the proposed project. With implementation of identified mitigation measures, this impact would be *less than significant.*

Development of 358 housing units would increase residential occupants of the project area, which could use open space areas for passive recreation. This alternative would include a community center for the faculty housing, and a community recreation center and toddler play structures for the family student housing, which would provide adequate recreational facilities for the associated increased population in the area of 927 residents. As such, project residents would not rely solely on existing recreational facilities in the area that would lead to deterioration of those facilities. This alternative proposes fewer units of housing, and correspondingly fewer residents, than the proposed project, although this alternative would only implement the open space improvements identified in the COPR Management Plan, which provide limited recreational benefits. The coastal access and open space improvements identified in the Open Space Plan would not occur under this alternative. As a consequence, this alternative could result in greater informal recreational use of the open space areas under UCSB jurisdiction, which could lead to further informal trails and other uncontrolled uses of undeveloped open space. Such increased use could result in accelerated deterioration of the open space areas on the North and West Campuses. With implementation of MM 4.10-1(a) through MM 4.10-1(d), this impact would be reduced to a *less-than-significant level.*

Impact 4.10-2. Implementation of the South Parcel Alternative would include recreational facilities associated with residential development, which would not have an adverse physical effect on the environment. With implementation of mitigation measures identified for other environmental resources, this impact would be *less than significant*.

In conjunction with residential development, on-site recreational facilities such as a swimming pool, toddler/youth play areas, and community centers would be provided. Given the relatively small overall square footage of these facilities, such improvements are unlikely to result in significant adverse physical effect on the environment. The construction and operation of recreational facilities could contribute to the effects on air, noise, biological resources, and other resource areas, as discussed within each of the relevant resource sections in the analysis of this alternative. With implementation of the mitigation measures identified for other environmental resources, implementation of the proposed recreational elements of this alternative would not result in adverse physical effects on the environment, and this impact would be *less than significant*. Although fewer open space improvements would occur under this alternative, this impact would be comparable to the proposed project because the amount and type of recreational amenities that would be developed under this alternative are comparable to the proposed project.

Impact 4.10-3. Implementation of the South Parcel Alternative could result in the loss of existing recreational opportunities. Even with implementation of identified mitigation measures, this impact would be *significant and unavoidable.*

Residential development on the South Parcel would result in the loss of open space areas that are used for passive recreational activities. Residential development on the Storke-Whittier Parcels would result in the removal of the existing driving range for the Ocean Meadows Golf Course, although the golf course would not be otherwise affected by this alternative. Given the

proximity of other public golf driving ranges, the loss of the existing driving range for the Ocean Meadows Golf Course would not be significant.

Residential development on the South Parcel would result in fragmentation of the larger Ellwood-Devereux mesa open space through removal of 40 acres from a central portion of this undeveloped area. Recreational facilities provided within the residential developments and improvements to open space would partially offset the loss of existing recreational opportunities. The coastal access improvements and passive recreational opportunities that would result from implementation of the Open Space Plan (under the proposed project) would not occur. Restrictions on public access per the COPR Management Plan (to protect sensitive resources), would narrow the recreational opportunities available to the public.

The extent of potential impacts would be reduced through continued implementation of University policies and adherence to MM 4.10-1(a) through MM 4.10-1(d). However, considered together with the fragmentation of the existing open space area, the loss of existing active and passive, informal recreational uses would result in a *significant and unavoidable* impact under this alternative. Under this alternative, potential impacts would be greater than the proposed project.

6.4.2.11 Cultural Resources

Impact 4.11-1. Implementation of the South Parcel Alternative would not result in the modification or demolition of structures that have been designated as eligible or potentially eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR). *No impact* would result.

This alternative would not modify or demolish any existing structures as part of the project, thus, implementation of this alternative would not result in the modification or demolition of structures that have been designated as eligible or potentially eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR), and therefore *no impact* would result, comparable to the proposed project.

Impact 4.11-2. Construction activities associated with implementation of the South Parcel Alternative could result in damage to or the destruction of archaeological resources. With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

Development of housing would result in grading of approximately 40 acres of land on the South Parcel and approximately 13.5 acres of land on the Storke-Whittier Parcel. There are known archaeological sites on or near the South and Storke-Whittier Parcels, and there is the potential for additional, undocumented sites to exist. Residential development or COPR management activities have the potential to damage or disturb these sites as a result of grading or other ground disturbance. Under this alternative, the University would implement MM 4.11-2(a) through 4.11-2(h). With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level. Although a greater area would be subject to residential

development, ground disturbance within undeveloped and natural reserve areas would be reduced, and this impact would be comparable to the proposed project.

Impact 4.11-3. Construction activities associated with implementation of the South Parcel Alternative could result in damage to or the destruction of paleontological resources. With the implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level.

As described in the previous impact, ground-disturbing activity would occur in conjunction with residential development. Although paleontological resources have been found on the project site, they have been marine fossils, and the County is rich with such marine fossil resources. However, were vertebrate fossils to be found during construction activities associated with implementation of this alternative, these would be considered rare, and the damage or destruction of such resources would be considered a significant impact. The University would implement MM 4.11-2(d) and 4.11-2(e), and this impact would be reduced to a *less-than-significant* level. Although a greater area would be subject to residential development, less disturbance would occur within open space areas, and this impact would be comparable to the proposed project.

Impact 4.11-4. Construction activities associated with implementation of the South Parcel Alternative could result in the disturbance of human remains. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level.

As described in earlier impact analysis, there are archaeological sites in the project area, including one that has yielded human remains. Although no part of the project area has a recorded use as a human cemetery, the potential exists for human remains to be uncovered as a result of ground-disturbing activities associated with construction of this alternative. COPR management activities would generally result in limited opportunities to encounter or disturb human remains.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment per Section 5097 of the California Public Resources Code. The University would implement MM 4.11-4, to require notification of the County Coroner in the event of a discovery of a burial, human bone, or suspected human bone and compliance with regulations regarding Native American involvement and burial practices, as necessary. With implementation of MM 4.11-4, this impact would be reduced to a *less-than-significant* level. Although a greater area would be subject to residential development, less disturbance would occur within open space areas, and this impact would be comparable to the proposed project.

6.4.2.12 Traffic and Circulation

Impact 4.12-1. Implementation of the South Parcel Alternative would result in additional vehicular trips, which would increase traffic volumes and degrade intersection levels of service. This impact would be *significant and unavoidable*.

The South Parcel Alternative would include development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel, which would increase the residential population within the project area and result in the generation of vehicle trips. Continued management of the COPR could result in some additional passive recreational use of open space areas; however, no reliable estimate of such increased usage is available.

Trip generation estimates for the Family Student Housing component and the Open Space Plan parking areas within the University's jurisdiction would generally be the same as the proposed project. Trip generation estimates for Alternative 1, are presented in Table 6-6, which shows that this would generate 3,235 average daily trips (ADT), with 278 trips occurring during the P.M. peak hour.

Table 6-6.
South Parcel Alternative Trip Generation Estimates

		ADT		P.M. PHT	
Land Use	**Size**	**Rate**	**Trips**	**Rate**	**Trips**
Faculty Housing – South Parcel					
Attached Single Family Housing[2]	22 Units	9.09	200	0.81	18
Courtyard Townhouse[1]	48 Units	8.32	399	0.62	30
Duplex Housing[1]	8 Units	8.32	67	0.62	5
Detached Single Family Housing[2]	105 Units	9.09	954	0.81	85
Courtyard Apartment[3]	24 Units	6.83	164	0.50	12
Family Student Housing					
Multi-Family Housing[4]	151 Units	7.39	1,116	0.65	98
Open Space Plan					
Proposed Parking Facilities	72 Spaces	4.65[5]	335	0.42[5]	30
Total			**3,235**		**278**

Notes:

[1]ITE rates for Residential Condominium (ITE #230) with adjustments for alternative commute trips (i.e. bicycle, walking etc.).

[2]ITE rates for Single Family Detached (ITE #210) with adjustments for alternative commute trips (i.e. bicycle, walking etc.).

[3]ITE rates for Apartment (ITE #220) with adjustments for alternative commute trips (i.e. bicycle, walking, etc.).

[4]Rates derived from counts at existing UCSB married student housing (Storke Campus).

[5]Trip generation includes total traffic for Open Space Plan elements. Some of the traffic generated by the proposed Open Space Plan parking lots will be redistributed from the existing parking lots.

The trip distribution pattern on the study-area street network for Alternative 1 would be the same as for the proposed project. The South Parcel Faculty Housing site would access the study-area street network via a connection to the existing Venoco access roadway that is west and north of the West Campus Apartments. This roadway connects to Storke Road between

Whittier Drive and El Colegio Road. Figure 6-5 shows the Alternative 1 project-generated ADT on the study-area street network and Figure 6-6 shows the Alternative 1 project-generated P.M. peak hour traffic volumes at the study-area intersections. As with the proposed project, the assignment of Alternative 1 traffic includes adjustments to account for trips generated by students that currently live in the Goleta/Santa Barbara area that would relocate to the Family Student Housing after the project is open. The adjustments are based on data provided by UCSB staff.

The operational characteristics of the roadway segments within the study-area were analyzed assuming the Existing + South Parcel Alternative ADT volumes presented in Figure 6-7. The text below discusses the roadway segments that would exceed acceptable operations with Existing + South Parcel Alternative volumes and identifies the significance of the South Parcel Alternative traffic additions. The threshold used to determine roadway impacts for segments exceeding the acceptable capacity rating or design capacity is a minimum traffic volume increase of 1.0 percent.

El Colegio Road. The existing traffic volumes on the segments of El Colegio Road located east and west of Los Carneros currently exceed the County's roadway design capacity for a two-lane arterial roadway. This alternative would add 664 ADT and 702 ADT on El Colegio Road east and west of Los Carneros Road respectively, increasing the ADT volumes on these segments by approximately 3 percent, a significant impact to El Colegio Road between Camino Corto Lane and Stadium Road.

Los Carneros Road. The existing traffic volumes on Los Carneros Road between Hollister Avenue and Mesa Road exceed the design capacity and the volumes between Mesa Road and El Colegio Road exceed the acceptable capacity. This alternative would not add appreciable traffic to the segment between Hollister Avenue and Mesa Road. Alternative 1 would add 38 ADT to the segment between Mesa Road and El Colegio Road (less than 1 percent increase).

Storke Road south of Whittier Drive. The existing volumes (15,800 ADT) and existing + Alternative 1 volumes (16,747 ADT) on the two-lane segment of Storke Road south of Whittier Drive exceeds the acceptable capacity standard for this arterial. Alternative 1 would add 947 ADT to the two-lane segment, increasing volumes by about 6%, a significant impact

Storke Road North of Hollister Avenue. The existing volumes (40,000 ADT) and existing + Alternative 1 volumes (41,430 ADT) on the four-lane segment of Storke Road north of Hollister Avenue exceed the acceptable capacity standard (acceptable capacity < 34,000 ADT). The project would add 1,430 ADT to this segment, increasing volumes by about 4 percent, a significant impact

Levels of service were calculated for the study-area intersections assuming the existing + South Parcel Alternative P.M. peak hour traffic forecasts are illustrated in Figure 6-8. Table 6-7 shows existing + South Parcel Alternative P.M. peak hour levels of service for the study area intersections and identifies the significance of South Parcel Alternative traffic.

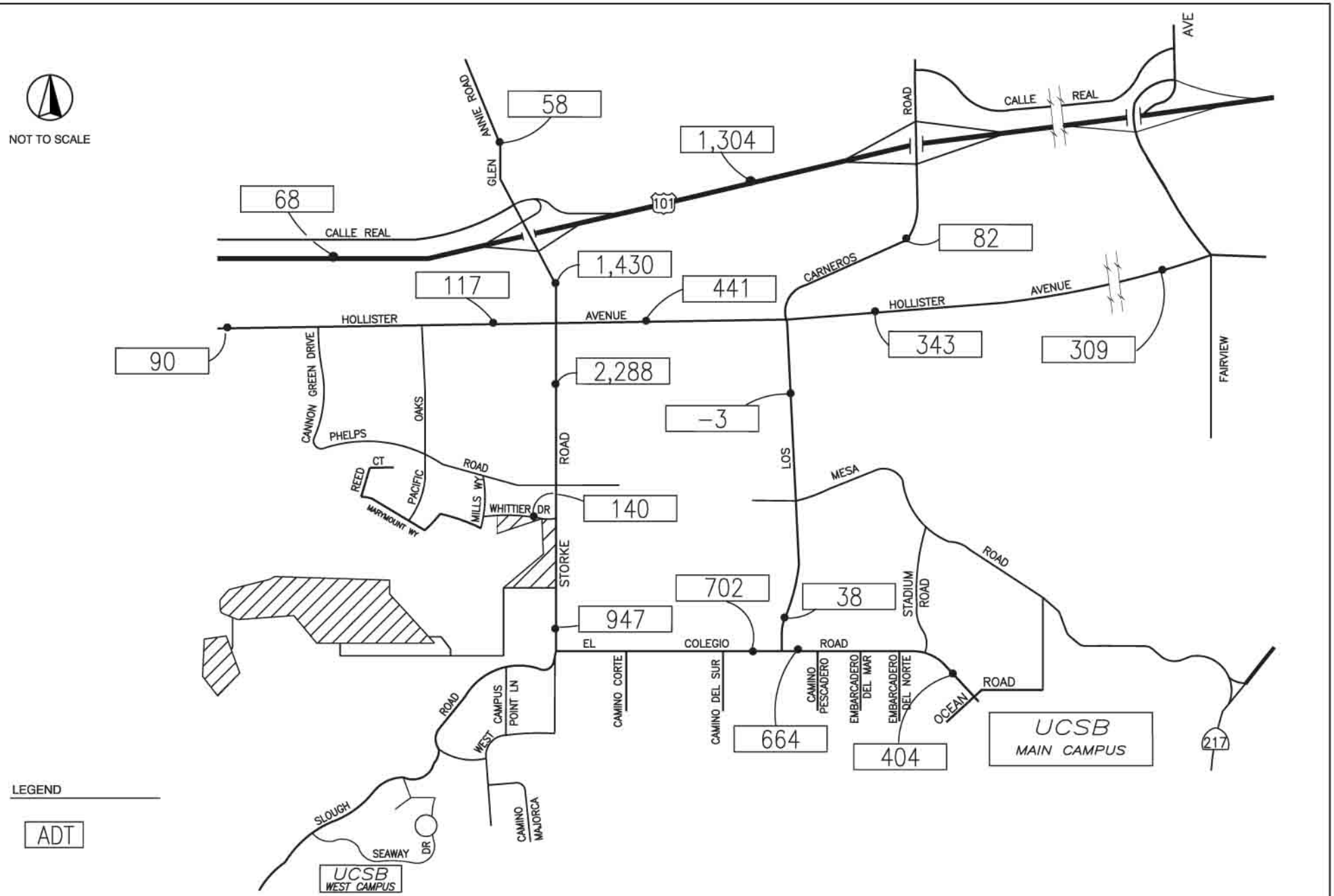

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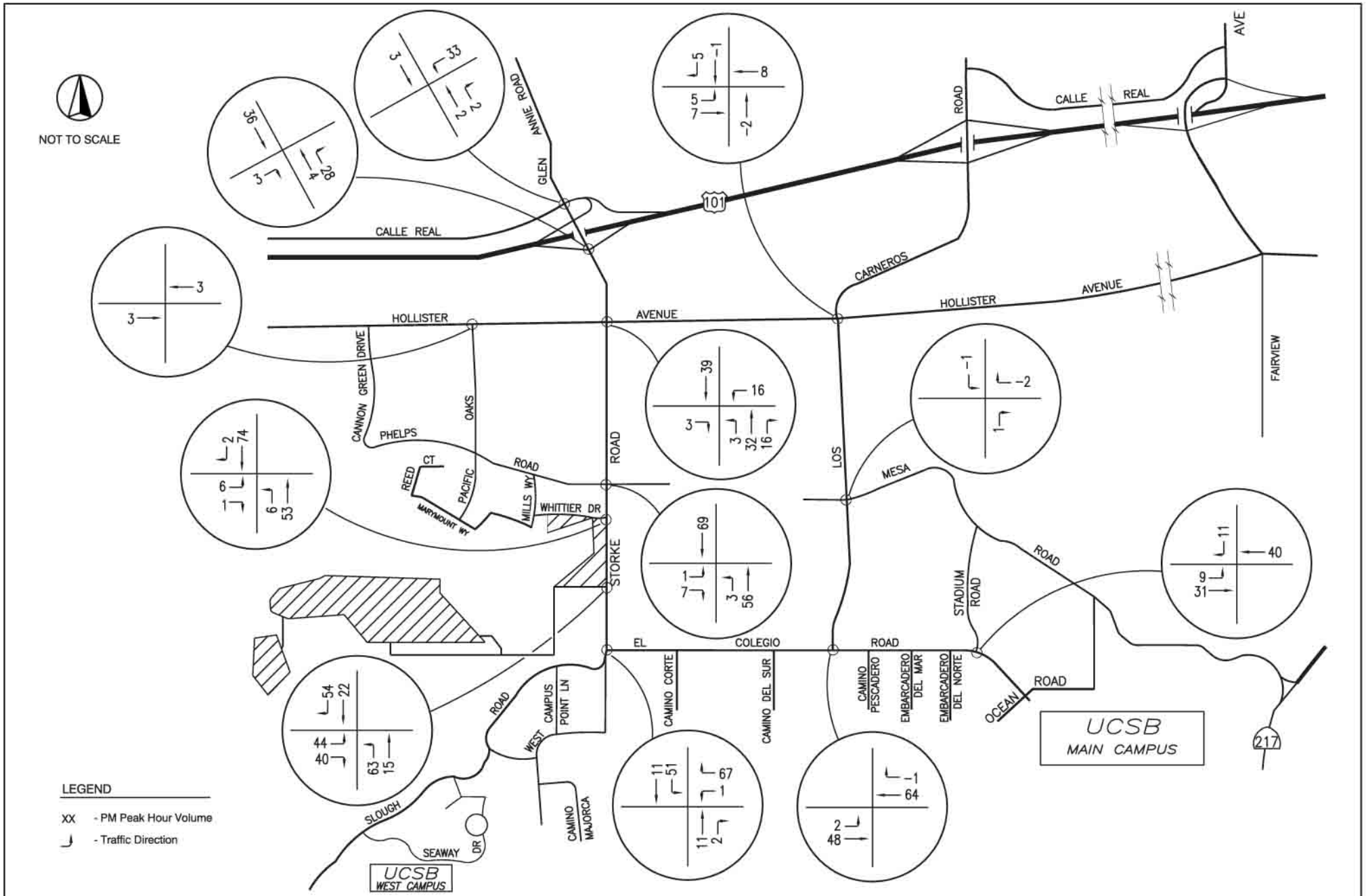
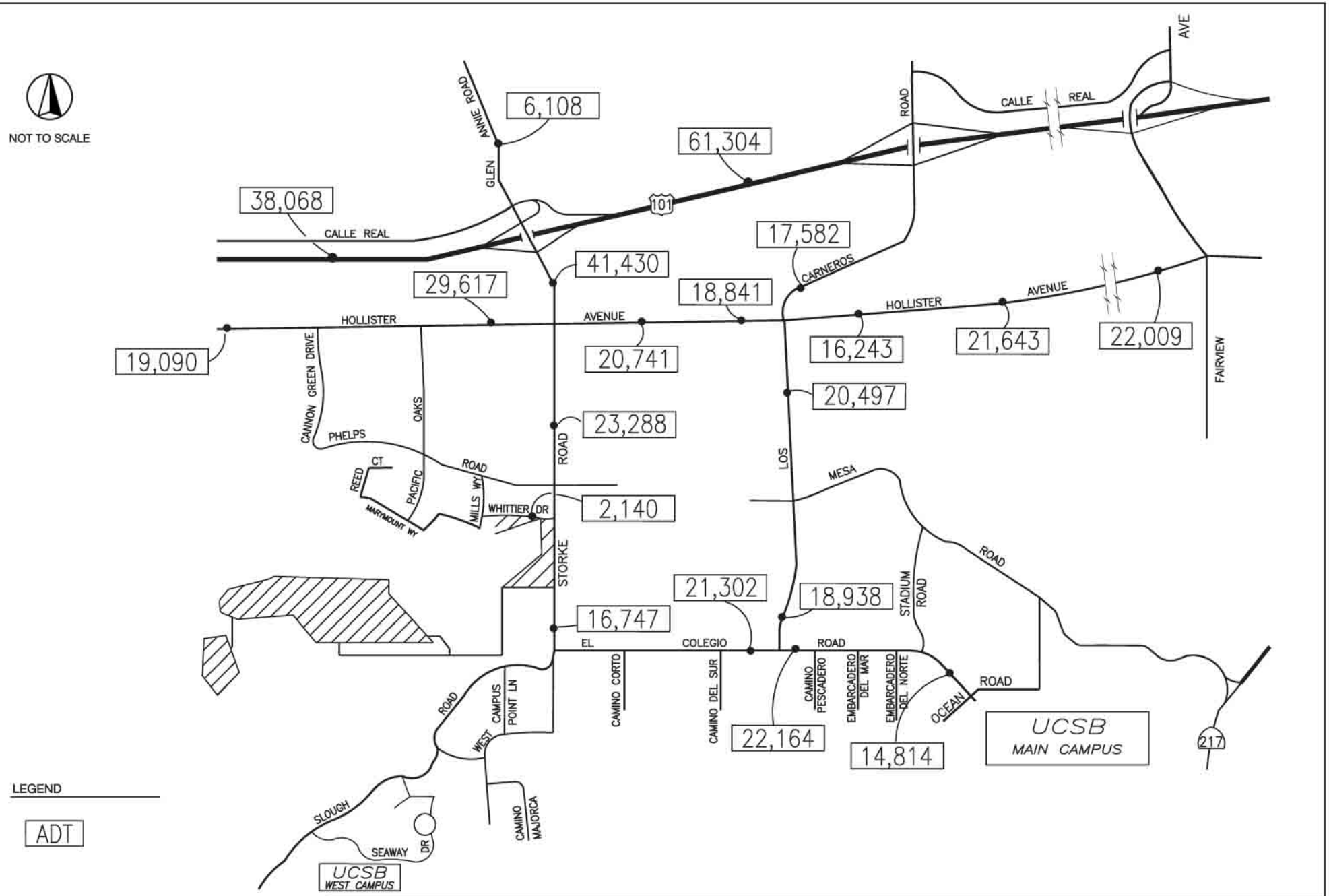
Figure 6-5. Alternative 1
Average Daily Traffic Volumes

April
2004



UCSB	Faculty and Family Student Housing, Open Space Plan & LRDP Amendment EIR **University of California, Santa Barbara**	Figure 6-6. Alternative 1 P.M. Peak Hour Traffic Volumes	April 2004



UCSB	Faculty and Family Student Housing, Open Space Plan & LRDP Amendment EIR **University of California, Santa Barbara**	Figure 6-7. Existing + Alternative 1 Average Daily Traffic Volumes	April 2004

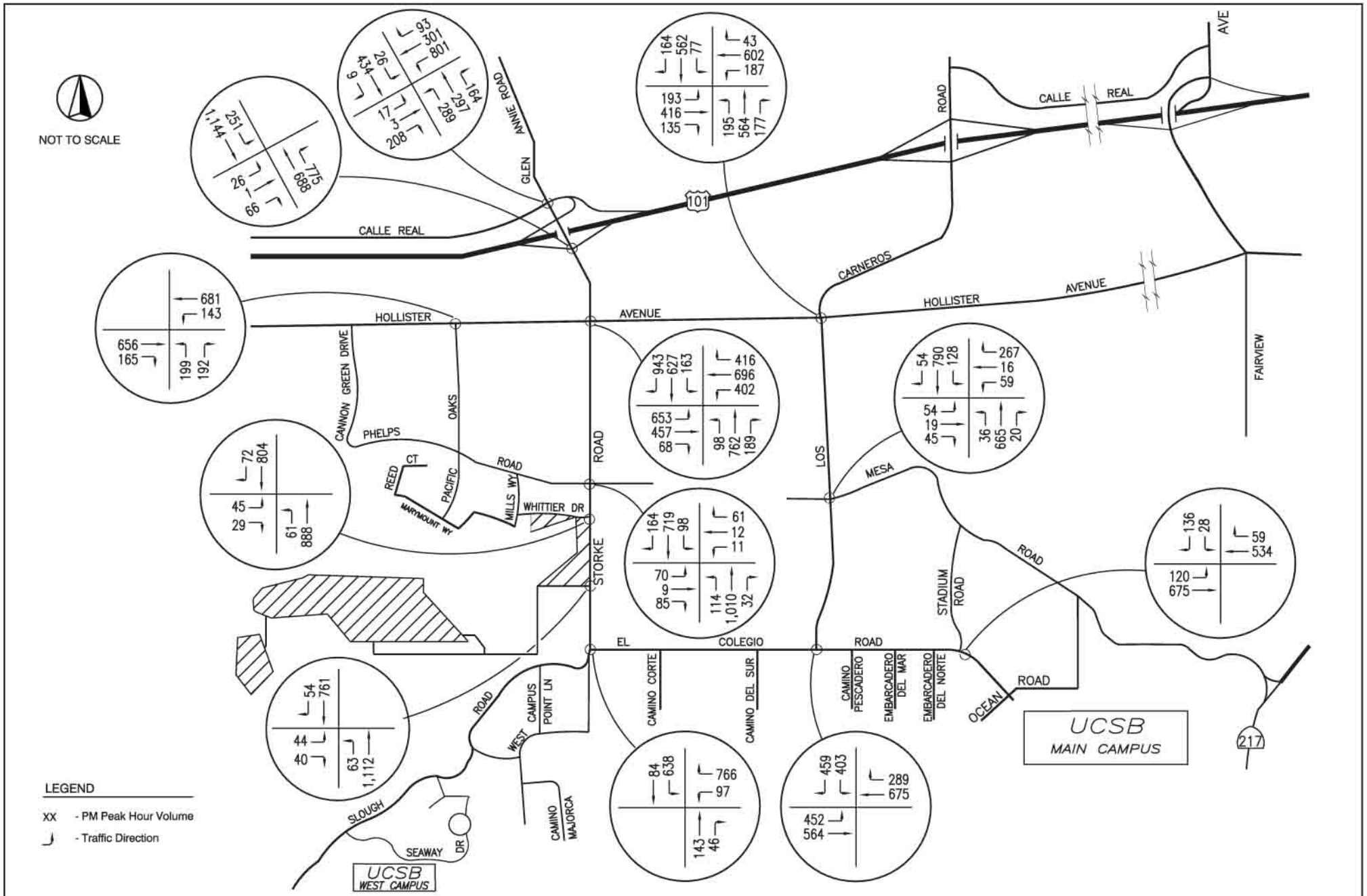


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Figure 6-8. Existing + Alternative 1
P.M. Peak Hour Traffic Volumes

April
2004

Table 6-7.
Existing + South Parcel Alternative P.M. Peak Hour
Intersection Levels of Service

Intersection	Existing V/C/LOS	Ex + Alt 1 V/C/LOS	V/C Increase or Trips	Impact
Hollister Ave/Pacific Oaks Rd	0.56/LOS A	0.56/LOS A	0.001	No
Storke Rd/U.S. 101 NB Ramps	0.59/LOS A	0.60/LOS A	0.008	No
Storke Rd/U.S. 101 SB Ramps	0.49/LOS A	0.50/LOS A	0.013	No
Storke Rd/Hollister Ave	**0.84/LOS D**	**0.84/LOS D**	**109 Trips**	**Yes**
Storke Rd/Phelps Rd	0.56/LOS A	0.58/LOS A	0.018	No
Storke Rd/Whittier Dr	16.6 sec/LOS C[1]	17.9 sec/LOS C[1]	NA	No
Storke Rd/El Colegio Rd	0.43/LOS A	0.45/LOS A	0.023	No
Los Carneros/Hollister Ave	0.64/LOS B	0.65/LOS B	0.003	No
Los Carneros/Mesa Rd	0.80/LOS C	0.80/LOS C	0	No
Los Carneros/El Colegio Rd	**1.02/LOS F**	**1.06/LOS F**	**113 Trips**	**Yes**
Stadium Rd/El Colegio Rd	0.57/LOS A	0.61/LOS B	0.038	No

Notes:
[1] V/C ratio not applicable for stop-sign controlled intersections. LOS based on average vehicle delay.

Bolded values exceed the Santa Barbara County impact thresholds.

The level-of-service results shown in Table 6-7 indicate that this alternative would generate a project-specific significant impact at two intersections: Storke Road/Hollister Avenue and Los Carneros Road/El Colegio Road.

The North Campus Family Student Housing Site would gain access from Storke Road at the existing connection that serves the existing UCSB Storke Apartments complex. The operation of the South Parcel Alternative access road intersection at Storke Road was analyzed assuming cumulative + South Parcel Alternative P.M. peak hour traffic volumes. The plan for the North Campus Family Student Housing site shows that two inbound lanes and two outbound lanes would be provided at the intersection.

With implementation of MM 4.12-1(a) through 4.12-1(d), increases in roadway traffic congestions or degradation of intersection levels of service would be reduced to a less-than-significant level. However, mitigation of the significant impact on Storke Road north of Hollister (e.g., widening the freeway overpass) is neither funded nor programmed, therefore this impact would be *significant and unavoidable*. As similar levels of vehicle trips would be generated by this alternative, impacts would be comparable to the proposed project.

Impact 4.12-2. Implementation of the South Parcel Alternative would result in the generation of construction-related vehicle trips, which could temporarily impact traffic conditions along roadway segments and at individual intersections. This impact would be *less than significant*.

This alternative would include construction of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel, which would result in the generation of construction-related vehicle trips over the approximately two-year construction period for the housing. Management of the COPR could include some restoration activities that generate trips associated with construction workers and/or vehicles.

Construction of buildings and facilities could involve clearance and grading of the site, delivery of building materials and trips associated with construction workers. The simultaneous construction of both residential projects could result in the approximately twenty deliveries of construction materials each day (10 for each site), resulting in approximately 40 construction truck trips per day. With each construction truck trip equivalent to approximately 2.5 vehicle trips (due to the length of the truck), twenty deliveries of construction materials could result in approximately 100 vehicle-equivalent trips per day. Concurrently, an estimated 40 construction workers could be present on the two sites, generating an additional 80 trips per day (assuming one single inbound and outbound trip per worker). Thus, during peak construction activity on the residential parcels, approximately 180 trips per day could be generated.

The short-term addition of approximately 180 trips per day is not anticipated to result in any substantial degradation of intersection volumes at any location in the vicinity of the project area, given existing traffic volumes and levels of service. Because of the typical hours of construction (e.g., 7 am to 3:30 PM), most trips associated with construction workers would not affect PM peak hour traffic conditions. Thus, construction trips associated with this alternative would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system, and this impact would be *less than significant*. Although less residential development would occur under this alternative, impacts would be comparable to the proposed project.

Impact 4.12-3. Implementation of the South Parcel Alternative would not result in additional vehicular traffic volumes that would exceed established service levels on roadways designated by the Santa Barbara County Congestion Management Program. With implementation of identified mitigation measures, this impact would be reduced to a less-than-*significant* level.

Amendment of the LRDP to permit residential development on the North Campus, coastal access improvements, and open space management activities, including habitat restoration, would result in additional vehicular trips that could exceed, either individually or cumulatively, a level of service standard established by the County Congestion Management Agency for designated roads or highways.

The Storke Road/Hollister Avenue intersection is forecast to operate at LOS D with existing + Alternative 1 and at LOS E with cumulative + Alternative 1 traffic. This Alternative would add 109 trips to the intersection during the P.M. peak hour period, which exceeds the CMP impact threshold (threshold = 20 trips). With implementation of one of the improvement options identified for MM 4.12-1(b), this impact would be mitigated.

This alternative would have its highest concentration of traffic additions on U.S. Highway 101 between the Storke Road and Los Carneros Road interchanges, and add 33 northbound and 28 southbound trips to this segment during the P.M. peak hour period. According to the CMP monitoring report, this segment operates at LOS C in both directions during the P.M. peak hour period. Based on the CMP impact criteria, this alternative would not significantly impact this segment of U.S. Highway 101.

Thus, this impact would not result in additional vehicular traffic volumes that exceed established service levels on roadways designated by the Santa Barbara County Congestion Management Program, and this impact would be less than significant. As a comparable number of trips would be generated by this alternative, this impact would be comparable to the proposed project.

Impact 4.12-4. Implementation of the South Parcel Alternative would not result in vehicular hazards due to design features or land use incompatibilities. This impact would be *less than significant*.

It is anticipated that any new roadway segments provided in conjunction with residential development would employ the use of standard engineering practices (e.g., use of standard road and driveway widths, provision of adequate sight lines, and avoidance of sharp turning radii) and traffic mitigation strategies (e.g., installation of control devices such as stop signs or signal lights as needed) to avoid design elements that could result in hazards due to features such as sharp curves or dangerous intersections.

This alternative would include residential development on the Storke-Whittier Parcel in proximity to existing residential development (e.g., north of Whittier Drive, east of Storke Road, and the existing West Campus Student Family Housing complex) and thus would not result in traffic hazards related to land use incompatibilities. Development of housing on the South Parcel is not anticipated to result in potential hazards associated with operation of the EMT, which only requires infrequent vehicular access. With use of standard engineering practices, this impact would be *less than significant*. As residential development and provision of new roadways would be comparable to the proposed project, this impact would be comparable to the project.

Impact 4.12-5. Implementation of the South Parcel Alternative would not result in pedestrian hazards due to design features or land use incompatibilities. This impact would be *less than significant*.

This would include development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel, which would increase traffic on local streets and modify pedestrian access routes, which could pose hazards to pedestrians. Implementation of the COPR Management Plan would result in coastal access improvements, including conversion of some portion of existing trails to boardwalks and/or coastal access stairways.

A portion of the east side of Storke Road adjacent to the Storke-Whittier Parcel, includes a decomposed granite path. However, grade separated areas are provided for pedestrians along both sides of the street. Therefore, hazards would not result due to additional pedestrian traffic generated by this alternative. The Storke/Phelps Intersection is controlled by a signal. These existing traffic control measures ensure safe crossing of pedestrians at these intersections in order to access sidewalks. Additional traffic on the roadways may result in slightly longer delays for pedestrians prior to crossing the street. However, existing traffic control measures and the provision of sidewalks on at least one side of the roadway would continue to ensure safe pedestrian use of Phelps Road.

Development of faculty housing on the South Parcel would include the provision of alternative pedestrian access (e.g., a sidewalk or separated decomposed granite path) along the roadway. This would connect to the sidewalk along the eastern edge of the existing West Campus Family Student Housing, which terminates at the signalized intersection of Phelps and El Collegio Roads.

With inclusion of standard engineering techniques for project-specific improvements to sidewalks and pathways, the South Parcel Alternative would not result in any features that would pose hazards to pedestrians, and this impact would be *less than significant*. As residential development would occur in two locations, this impact would be comparable to the proposed project.

Impact 4.12-6. Construction of the South Parcel Alternative could result in short-term vehicular hazards due to closure of traffic lanes or roadway segments. With implementation the identified mitigation measure, this impact would be reduced to a *less-than-significant* level.

Development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel would result in construction on approximately 40 acres of the North Parcel and 13.5 acres of the Storke-Whittier Parcel. Construction within these areas could impact adjacent streets, during the delivery of construction materials, installation or extension of utilities, or the installation of street or pedestrian improvements.

To reduce potential hazards associated with street closures, the University would implement MM 4.14-6, to require maintenance of a single traffic lane at all times, and signal carriers during such periods. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As construction activity associated with residential development would occur at two locations, this impact would be comparable to the proposed project.

Impact4.12-7. Construction of the South Parcel Alternative would not substantially increase pedestrian hazards due to closure of sidewalks or pedestrian paths. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level.

Construction activities associated with residential development could necessitate temporary closure of pedestrian sidewalks and paths or the provision of temporary pedestrian routes. The arrival or departure of construction vehicles and delivery of construction materials could intermittently disrupt pedestrian travel along pedestrian routes adjacent to construction sites. The University will implement MM 14.12-7, to require the provision of alternative pedestrian routes and assure such routes are accessible. With implementation of this mitigation measure, this impact would be reduced to a *less-than-significant* level. As construction activity associated with residential development would occur at two locations, this impact would be comparable to the proposed project.

Impact 4.12-8. Implementation of the South Parcel Alternative would not impair emergency access in the long term. This is considered a *less-than-significant* impact.

Implementation of the alternative would result in additional vehicular trips that would increase traffic volumes on the local street and highway network and degrade intersection levels of service. As discussed above in Impact 4.12-1, most intersections in the alternative vicinity would continue to operate at acceptable levels of service. In cases of traffic delays, emergency vehicles traverse congested roadways generally by requiring vehicles to move over to allow emergency vehicles to pass through. Thus, emergency vehicles are not anticipated to experience any substantial delays as a result of the significant and unavoidable traffic impacts that would occur, and this impact would be *less than significant*. Although trip generation would be slightly less under this alternative, this impact would be comparable to the proposed project.

Impact 4.12-9. Construction of the South Parcel Alternative could impair emergency access during the short term. With implementation of the identified mitigation measure, this impact would be *less than significant*.

Construction of faculty and family student housing and open space improvements would generate construction-related vehicle trips; however, any short-term increases in traffic would not substantially increase traffic volumes on any roadways in the project vicinity. The University would implement MM 4.12-9, to require notification of emergency service providers in the event of any project-related street closures. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As a comparable level of construction activity would occur under this alternative, this impact would be comparable to the proposed project.

Impact 4.12-10. Implementation of the South Parcel Alternative would not result in inadequate parking capacity. This impact would be *less than significant*.

A total of 1041 parking spaces would be provided under this Alternative. This equates to slightly more than 2 spaces per unit, which will satisfy the project's parking demands based on parking demand rates presented in the Institute of Transportation Engineers (ITE) parking generation report. The proposed widths of street segments would result in restricted on-street parking availability. This alternative should provide sufficient off-street parking spaces to satisfy

anticipated parking demands. There are existing partially improved or unimproved parking lots at four locations, and parking occurs at each location for access to the existing open space.

With a total of 485 parking spaces for the South Parcel, the supply of parking would adequately meet parking demand associated with residential occupants and their visitors. As there would be no additional public parking added in this alternative, but correspondingly there would be fewer open space improvements, public parking would not be inadequate, as access would still be provided in other on-campus parking lots. This impact would be *less than significant*. Although less residential development would occur under this alternative, this impact would be comparable with the proposed project, as parking would be provided to meet demand for the additional housing.

Impact 4.12-11. Construction of the South Parcel Alternative would require temporary parking for construction workers. This impact would be *less than significant*.

During construction of the residential structures, construction workers could be present on the three residential development sites and the areas with open space improvements. With the ample acreage on each parcel, it is anticipated that sufficient area would be available to provide on-site parking for construction, or in nearby areas. Thus, this alternative would not result in inadequate parking capacity during construction, and this impact would be *less than significant*. As a comparable level of construction activity would occur under this alternative, this impact would be comparable to the proposed project.

Impact 4.12-12. Implementation of the South Parcel Alternative would not conflict with applicable policies, plans, or programs supporting alternative transportation. This impact would be *less than significant*.

The development of both faculty housing and student housing in a location close to campus would facilitate the use of alternative modes of travel to the campus, including bicycle commuting on adjacent Class II bike lanes, or taking mass transit from adjacent or proximal bus stops. This alternative would place faculty and students in locations that are closer in proximity to the campus than where they could locate otherwise in Goleta, Santa Barbara, or the County, and would, therefore, serve as a strategy to reduce long distance vehicular trips to and from the campus. This impact would be *less than significant*. Although slightly less residential development would occur under this alternative, this impact would be comparable to the proposed project.

Impact 4.12-13. Project implementation would not substantially increase demand for public transit. This impact would be *less-than-significant* impact.

As discussed in the setting for the proposed project (4.12 Transportation and Circulation), adequate transit facilities serve the site, and while the increase in the local population would increase demands for public transit, existing transit facilities could adequately serve demands from proposed development. This impact would be *less than significant*. As slightly less residential

development would occur under this alternative, this impact would be less than the proposed project.

6.4.2.13 Noise

Impact 4.13-1. Implementation of the South Parcel Alternative would not expose new on-campus residential uses to noise levels in excess of the State's 45 dBA CNEL interior noise standard. This impact would be *less than significant*.

Development of faculty and family student housing would increase vehicular trips in the project vicinity (as discussed below), introduce new sources of stationary noise (as discussed below), and result in the exposure of residential occupants to increased ambient noise levels. In addition, residential development on the North Campus would be exposed to intermittent noise from aircraft operations from the Santa Barbara Municipal Airport (as discussed below in Impact 4.13-7). Given existing and projected ambient noise levels, and the anticipated exterior-to-interior noise reduction of 30 dBA or more in new residential buildings, interior noise levels within new residential buildings would not exceed 45 dBA CNEL, and this impact would be *less than significant*. Although slightly less residential development would occur under this alternative, impacts from ambient noise would be comparable to the proposed project.

Impact 4.13-2. Construction of residential structures could generate and expose persons to excessive groundborne vibration or groundborne noise levels. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level.

Construction of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel, would result construction activities (such as clearance and grading of residential sites) that would result in the generation of groundborne noise and vibration. Construction activities would primarily impact the existing residences located adjacent to the north campus housing sites (e.g., the existing West Campus Family Student Housing), with vibration levels possibly reaching up to 81 VdB at the properties located in close proximity the project sites. This would exceed the 80 VdB threshold for residences and buildings where people normally sleep. Therefore, this impact would be potentially significant if it occurs during the hours when most people sleep. The University would implement MM 4.13-2, to limit hours of construction to the hours between 7:00 A.M. and 5:00 P.M, with no construction on weekends or federal holidays, and this impact would be reduced to a *less-than-significant* level. As slightly less residential development would occur under the alternative, this impact would be less than the proposed project.

Impact 4.13-3. Operational impacts of the South Parcel Alternative would not generate and expose persons to excessive groundborne vibration or groundborne noise levels. This impact would be *less than significant*.

If this alternative were completed and operational, background vibration levels associated with heating, ventilation, and air conditioning (HVAC) systems equipment in residential buildings

would be expected to average around 50 VdB, substantially less than the 80 VdB threshold for residential buildings. Therefore, this impact would be *less than significant*. Although slightly less residential development would occur under this alternative, vibration levels associated with HVAC equipment would be similar to the proposed project, and this impact would be comparable to the proposed project.

Impact 4.13-4. Operation of the South Parcel Alternative would generate increased local traffic volumes, but would not cause a substantial permanent increase in noise levels above existing noise levels. This impact would be *less than significant*.

Development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel would result in the generation of additional vehicular trips that would increase ambient noise levels in the project vicinity. This increase in traffic in the local vicinity would slightly increase ambient noise levels. The changes in future noise levels at the selected noise-sensitive locations along the study-area roadway segments in the project vicinity are identified in Table 6-8. As shown, Alternative 1 would increase local noise levels by a maximum of 1.8 dBA Ldn, which is inaudible/imperceptible to most people and would not exceed the identified thresholds of significance. Therefore, this impact would be *less than significant*. As slightly less residential development would occur under the alternative, this impact would be less than the proposed project.

Impact 4.13-5. Operation of the South Parcel Alternative could add new stationary sources of noise, but would not cause a substantial permanent increase in ambient noise levels. This impact would be *less than significant*.

Development of faculty and family student housing would introduce new sources of stationary noise (e.g., HVAC systems). Residential HVAC systems typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. Given existing ambient noise levels, installation of HVAC systems in new residential buildings would not cause a substantial increase in existing noise levels by 5 dBA or more. This impact would be *less than significant*. As slightly less residential development would occur under the alternative, this impact would be less than the proposed project.

Impact 4.13-6. Construction of the South Parcel Alternative could result in substantial temporary or periodic increases in ambient noise levels. This impact would be *significant and unavoidable*.

Construction activities associated with the residential components of this alternative are expected to occur over a period of approximately 30 months. During construction, three basic types of activities would be expected to occur and generate noise. First, the development sites would be cleared and graded to accommodate the new residential structures, roads, and associated parking. Second, the buildings and parking lots would be constructed and readied for use. Finally, the area around the new buildings would be landscaped. During each stage of

Table 6-8. South Parcel Alternative Traffic Noise Impacts

Roadway Segment	Noise Level in dBA Ldn at 50 Feet			
	Existing Traffic Volumes	Existing + Alternative 1 Traffic Volumes	Increase	Significance Threshold
US Highway 101 west of Glen Annie/Storke Rd.	78.3	78.3	0.0	3.0
US Highway 101 west of Los Carneros	80.2	80.3	0.1	3.0
Hollister Avenue west of Cannon Green Dr.	70.5	70.5	0.0	3.0
Hollister Avenue west of Storke Rd.	72.3	72.3	0.0	3.0
Hollister Avenue west of Los Carneros Rd.	70.3	70.4	0.1	3.0
Hollister Avenue east of Los Carneros Rd.	71.0	71.1	0.1	3.0
Hollister Avenue west of Fairview Ave.	69.8	69.8	0.0	5.0
Phelps Road west of Pacific Oaks	57.9	59.7	1.8	5.0
Phelps Road west of Storke Rd.	61.2	62.0	0.8	5.0
Whittier Drive west of Storke Rd.	56.3	56.6	0.3	5.0
El Colegio Road west of Los Carneros Rd.	70.1	70.2	0.1	3.0
El Colegio Road east of Los Carneros Rd.	69.3	69.4	0.1	5.0
El Colegio Road northwest of Ocean Rd.	66.5	66.6	0.1	5.0
Cannon Green Drive south of Hollister Ave.	60.6	61.2	0.6	5.0
Pacific Oaks south of Hollister Ave.	60.4	60.9	0.5	5.0
Pacific Oaks south of Phelps Rd.	56.2	56.8	0.6	5.0
Glen Annie Road north of Calle Real	66.0	66.0	0.0	5.0
Storke Road north of Hollister Ave.	73.9	74.1	0.2	3.0
Storke Road south of Hollister Ave.	72.4	72.9	0.5	3.0
Storke Road south of Phelps Rd.	71.3	71.4	0.1	3.0
Storke Road north of El Colegio Rd.	68.9	69.2	0.3	5.0
Los Carneros Road north of Hollister Ave.	71.8	71.8	0.0	3.0
Los Carneros Road south of Hollister Ave.	72.8	72.8	0.0	3.0
Los Carneros Road north of El Colegio Rd.	70.9	70.9	0.0	3.0

Source: URS Corporation and EIP Associates, 2004.

development there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location of the activity.

Construction activities would primarily impact the existing residential land uses near the project site. Some of these existing uses would be located within 100 feet of a construction site. Construction noise levels could reach up to 80 dBA L_{eq} during the daytime at these buildings. This could be a temporary or periodic increase of more than 10.0 dBA L_{eq} over the existing daytime noise levels at these existing residences. As such, construction noise levels could substantially increase existing noise levels at some existing residential uses. The University would

implement MM 4.13-6(a), to restrict construction hours, MM 4.13-6(b), to place stationery construction equipment as far away from sensitive receptors as possible and shield where necessary, and MM 4.13-6(c), to require on-site signage listing construction hours and contact information for complaints regarding noise. These measures would not, however, ensure that construction noise levels would not result in a temporary or periodic increase by more than 10 dBA at noise sensitive uses located in close proximity to the construction sites, therefore, this impact would be *significant and unavoidable*. As slightly less residential development would occur under the alternative, this impact would be less than the proposed project.

Impact 4.13-7. Implementation of the South Parcel Alternative would not expose people residing in the project area to excessive noise levels related to aircraft operations. This impact would be *less than significant*.

All portions of the North and West Campuses are located outside of the limits of the 60 dBA CNEL contour for Santa Barbara Airport. Thus, occupants of the new residential structures would not be exposed to excessive noise levels associated with aircraft operations, and this impact would be *less than significant*. In addition, the exterior-to-interior reduction of newer homes is generally 30 dBA or more and, therefore, interior noise levels within the proposed residential units would not exceed the state's 45 dBA CNEL standard. Although slightly less residential development would occur under the alternative, noise levels from aircraft operations would be similar, and this impact would be comparable with the proposed project.

Impact 4.13-8. This alternative would not occur within the vicinity of a private airstrip. *No impact* would result.

Noise impacts from airport operations are addressed in Impact 4.13-7

6.4.2.14 Air Quality

Impact 4.14-1. Implementation of the South Parcel Alternative would not conflict with or obstruct implementation of the Clean Air Plan for Santa Barbara County. This impact would be *less than significant*.

Development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel, would increase the amount of occupied building space on the North Campus, increase vehicular trips in the project vicinity and increase operational emissions due to building mechanical equipment.

Although the South Parcel Alternative sites are now under the ownership of the University, the 1991 Clean Air Plan was developed when the sites were under the planning authority of the Goleta Community Plan. In that document, a total of 403 residential units were envisioned for the project sites and vicinity. This alternative proposed development of 358 faculty and student family housing units. This is less than the total envisioned for the area under the Goleta

Community Plan and the Clean Air Plan. Therefore, this alternative would not jeopardize attainment of state and federal ambient air quality standards in Santa Barbara County.

Another measurement tool to determine a project's consistency with the Clean Air Plan is to consider how a project accommodates the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the project and the community in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project would be consistent with the goals and policies of the Clean Air Plan.

Per this logic, the housing components of this alternative represent an opportunity to contribute to the fulfillment of the Clean Air Plan goals. Through providing faculty and student housing on the North campus, within shuttle bus, walking, or bicycling distance to classes and academic offices and laboratories, the project could result in a reduction of VMT and, thus, a reduction in mobile source emissions. Because VMT could be reduced as a result of this alternative, development of the project could result in a better air quality outcome than if the project were not to be implemented. The University encourages accommodation and use of other transit modes, including bicycles, and provides a campus shuttle bus line that will be extended to the proposed faculty housing and family student housing, to further reduce emissions. These campus policies are consistent with the goals of the Clean Air Plan for reducing the emissions associated with new development.

Based on this information, this alternative would not impair implementation of the Clean Air Plan, and this impact would be *less than significant*. Although this alternative would result in development of slightly less housing, the potential to conflict with or obstruct implementation of the Clean Air Plan would be comparable to the proposed project.

Impact 4.14-2. Construction activities would result in the generation of criteria pollutants, which would not contribute substantially to an existing or projected air quality violation. This impact would be *less than significant*.

Development of 207 units of faculty housing would occur on approximately 40 acres of land on the South Parcel. Development of 151 units of family student housing would occur on approximately 13.5 acres of land on the Storke-Whittier Parcel. During construction, three basic types of activities would be expected to occur and generate emissions. First, the development sites would be cleared and graded to accommodate building foundations, roads, and associated parking. Second, the buildings, roads, and parking areas would be constructed and readied for use. Finally, the area around the new buildings would be landscaped. During each stage of development there would be a different mix of equipment operating, and emissions would vary based on the amount of equipment in operation.

Because of the construction time frame and the normal day-to-day variability in construction activities, it is difficult to precisely quantify the annual emissions associated with the proposed construction activities. Nonetheless, the average annual emissions that are expected to occur

have been calculated using the URBEMIS 2002 computer model based on observations of similar residential construction projects at other campuses in the University of California system. The results of this effort are identified in Table 6-9. As shown construction-related annual emissions would not exceed SBCAPCD significance thresholds during the construction phases of development. Therefore, this impact would be *less than significant*. Because more single family development would occur under this alternative, this impact would be slightly greater than the proposed project.

Table 6-9. Estimated Annual Construction Emissions for Alternative 1

Emission Source	Emissions in Tons per Year				
	ROC	NO_x	CO	SO_2	PM_{10}
2005					
Site Grading Emissions	0.27	2.16	2.30	0.00	10.83
Building Construction	1.80	4.88	6.92	0.00	1.28
Total Emissions	2.07	7.04	9.22	0.00	12.11
SBCAPCD Thresholds	25.00	25.00	NT	NT	NT
Significant Impact?	No	No	No	No	No
2006					
Building Construction	7.56	8.16	13.20	0.00	1.92
SBCAPCD Thresholds	25.00	25.00	NT	NT	NT
Significant Impact?	No	No	No	No	No
2007					
Building Construction	4.41	4.69	7.70	0.00	1.12
SBCAPCD Thresholds	25.00	25.00	NT	NT	NT
Significant Impact?	No	No	No	No	No

NT No threshold.

Source: EIP Associates, 2004. Calculation sheets are provided in Appendix G.

Impact 4.14-3.Operation of the South Parcel Alternative would generate operational emissions from motor vehicles that exceed SBCAPCD thresholds. This impact would be *significant and unavoidable*.

Development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel, would increase vehicular trips in the project vicinity and increase operational emissions due to building mechanical equipment. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities at the project sites after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance equipment, and the use of consumer products. Mobile emissions would be generated by the motor vehicles traveling to and from the project sites.

The analysis of daily operational emissions has been prepared utilizing the URBEMIS 2002 computer model and traffic data from the project traffic report. The results of these calculations are presented in Table 6-10. As shown, the operational emissions from all project sources would not exceed the thresholds of significance recommended by the SBCAPCD. However, the emissions generated by motor vehicles would exceed the thresholds recommended for this source. Most of the vehicle trips that would otherwise be generated by faculty and students commuting to the campus are be eliminated or substantially reduced by locating the proposed uses close to the campus. The other trips are primarily associated with shopping, spouses commuting to and from work, driving children to and from school, and other miscellaneous trips. Even with implementation of MM 4.14-3, because the daily emissions associated with these trips would exceed the thresholds recommended by the SBCAPCD, this impact would be *significant and unavoidable*.

Table 6-10. Estimated Daily Operational Emissions for Alternative 1

Emission Source	Emissions in Tons per Year				
	ROC	NO_x	CO	SO_2	PM_{10}
All Project Sources					
Water and Space Heating	0.26	3.33	1.42	0.00	0.01
Landscape Maintenance	0.29	0.04	2.43	0.04	0.00
Consumer Products	17.51	--	--	--	--
Motor Vehicles	37.53	39.19	426.22	0.26	47.14
Total Emissions	55.59	42.55	430.07	0.29	47.15
SBCAPCD Thresholds	240.00	240.00	NT	NT	NT
Significant Impact?	No	No	No	No	No
Mobile Sources Only					
Motor Vehicles	39.46	41.40	447.86	0.27	49.55
SBCAPCD Thresholds	25.00	25.00	NT	NT	NT
Significant Impact?	Yes	Yes	No	No	No

NT No threshold.

Source: EIP Associates, 2004. Calculation sheets are provided in Appendix G.

Impact 4.14-4. Implementation of the South Parcel Alternative would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. This impact would be *significant and unavoidable*.

As identified in the thresholds of significance discussions, construction-related or operational emissions that exceed the thresholds of significance for an individual project would also cause a cumulatively considerable net increase in pollutants in Santa Barbara County. Table 6-9 indicates that the construction-related annual emissions would not exceed SBCAPCD significance thresholds during the construction phases of development. Likewise, Table 6-10 indicates that the operational emissions from all project sources not exceed the thresholds of significance

recommended by the SBCAPCD. However, the emissions generated by motor vehicles would exceed the thresholds recommended for this source. Even with implementation of MM 4.14-3, because the daily emissions associated with these trips would exceed the thresholds recommended by the SBCAPCD, this alternative would cause a cumulatively considerable net increase in emissions that are the precursors to ozone. This is a *significant and unavoidable* impact.

Impact 4.14-5. Implementation of the South Parcel Alternative would not expose sensitive receptors to substantial pollutant concentrations. This impact would be *less than significant*.

As was done to assess project CO concentrations, the simplified CALINE4 screening procedure was used to predict future CO concentrations at the study-area intersections in the vicinity of the project sites in the year 2007 with cumulative development projects and Alternative 1. The results of these calculations are provided in Table 6-11. As shown, future CO concentrations near these intersections would not exceed the national and state 9.0 ppm 8-hour ambient air quality standard for CO. Therefore, implementation of Alternative 1 would not expose any sensitive receptors located in close proximity to these intersections to substantial pollutant concentrations, and this impact would be *less than significant*. The resulting CO concentrations would be similar to those that would occur under the proposed project.

Table 6-11. Future With Alternative 1 Localized Carbon Monoxide Concentrations

Intersection	*8-Hour CO Concentrations in Parts per Million*		
	25 Feet	*50 Feet*	*100 Feet*
Hollister Avenue/Pacific Oaks Road	2.4	2.3	2.2
Storke Road/Hollister Avenue	3.3	3.0	2.7
Storke Road/Phelps Road	2.6	2.4	2.3
Storke Road/Whittier Drive	2.5	2.4	2.2
Storke Road/El Colegio Road	2.4	2.3	2.2
Los Carneros Road/Hollister Avenue	2.6	2.5	2.3
Los Carneros Road/Mesa Road	3.0	2.8	2.5
Los Carneros Road/El Colegio Road	3.4	3.0	2.7
Stadium Road/El Colegio Road	2.4	2.3	2.2

Notes:
National and state 8-hour ambient air quality standard is 9.0 ppm.

Source: EIP Associates, 2004. Calculation sheets are provided in Appendix G.

Impact 4.14-6. Implementation of the South Parcel Alternative would not expose sensitive receptors to substantial pollutant concentrations of toxic air emissions. This impact would be *less than significant*.

Development of 207 units of faculty housing on the South Parcel and 151 units of family student housing on the Storke-Whittier Parcel and management of open space would not result

in the generation of toxic air contaminants. Toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the project site. Only small quantities of common forms of hazardous or toxic substances, such as cleaning agents, which are typically used or stored in conjunction with residential uses, would be present. Most uses of such substances would occur indoors. Based on the common uses expected on the site, any emission would be minor.

Implementation of the South Parcel Alternative would not expose sensitive receptors to substantial pollutant concentrations of toxic air contaminants and this impact would be *less than significant*. As slightly less housing would be developed under this alternative, this impact would be less than the proposed project.

Impact 4.14-7. Implementation of the South Parcel Alternative would not create objectionable odors affecting a substantial number of people. This impact would be *less than significant*.

Development of 207 units of faculty housing would occur on approximately 40 acres of land on the South Parcel. Development of 151 units of family student housing would occur on approximately 13.5 acres of land on the Storke-Whittier Parcel. Construction activities occurring in association with this alternative would generate airborne odors associated with the operation of construction vehicles (i.e., diesel exhaust) and the application of architectural coatings. These emissions would occur during daytime hours only and would be isolated to the immediate vicinity of the construction site and activity. As such, they would not affect a substantial number of people.

Potential operational airborne odors could result from cooking activities associated with the new residential buildings. These odors would be similar to existing residential uses in the vicinity and would be confined to the immediate vicinity of the new buildings. The other potential source of odors would be new trash receptacles within the multi-family developments. The receptacles would have lids and be emptied on a regular basis, before potentially substantial odors have a chance to develop.

Implementation of the South Parcel Alternative would not create objectionable odors affecting a substantial number of people, and this impact would be *less than significant*. As slightly less residential development would occur under this alternative, this impact would be less than the proposed project.

6.4.2.15 Public Services

Impact 4.15-1. Implementation of the South Parcel Alternative could increase the demand for fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable response times and fire flows. With implementation of the identified mitigation measure, this impact would be *less than significant*.

Implementation of the housing component of this alternative would add 358 new housing units and approximately 927 new residents to the area served by the Santa Barbara County Fire Department with an existing average response time of less than five minutes. The service goal of five minutes or less at least 90 percent of the time would continue to be met (Maynard, 2003). Therefore, fire protection services for this alternative would be adequate with only 358 new housing units and approximately 927 new residents being added to the area.

Compared with the proposed project, this alternative would place faculty housing more proximate to open space areas designated to remain within the COPR and expansion area that are considered higher fuel loads than urban areas. The County Fire Department utilizes existing trails, including bike and foot trails, for access to wildland fires and for emergency response. Trails are considered by the County Fire Department to make good firebreaks. Therefore, implementation of the COPR Management Plan would not result in decreased response times or the need for additional facilities; however the firebreaks and fire access would be less compared to the proposed project.

The quantity of water required for fire protection (i.e., fire flows) varies and is dependent upon many factors that are specific to each particular building, such as the floor area, type of construction, expected occupancy, type of activities conducted within the building, and the distance to adjacent buildings. The Campus Fire Marshal reviews and approves all individual development plans prior to construction to ensure that adequate fire flows would be maintained. In addition, the University would continue to comply with all regulations of California Health and Safety Code Sections 13000 et seq. pertaining to fire protection systems, including provision of State-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems.

Implementation of MM 4.15-1 would ensure that impacts to fire protection services remain *less than significant* by facilitating emergency response, which has historically allowed the SBCFD to provide acceptable response times. This alternative would be adequately served by existing Santa Barbara County Fire Department facilities, and provision of new infrastructure associated with this alternative would provide adequate fire flow, in compliance with Uniform Fire and Building Codes. Therefore, this impact would be reduced to *less than significant*. Under this alternative, less development would occur than under the proposed project, and potential impacts would be less than under the proposed project.

Impact 4.15-2. Implementation of the South Parcel Alternative could increase the demand for police services, but would not require new or physically altered facilities to maintain acceptable service ratios for police protection services. With implementation of the identified mitigation measures, this impact would be *less than significant*.

Implementation of the housing component of this alternative would add 358 new housing units and approximately 927 new residents to the area served by the University Police Department. The UCPD Station would serve as the primary response unit to the project area. The UCPD has an average response time of less than eight minutes to the project site, which meets the service

goal of eight minutes or less at least 90 percent of the time (Signa, 2003). The Santa Barbara County Sheriff Department also assists the UCPD as necessary. Thus, police protection services for this alternative would be adequate.

Implementation of the COPR Management Plan would not result in any new residences or residents requiring police protection within the COPR and expansion area. However, the UCPD Station would respond to this open space area for needed police protection services. Therefore, the proposed management activities and physical improvements within the COPR and expansion area would not result in decreased response times or the need for additional facilities.

The SBCSD annually assesses staffing and equipment levels during its budgeting process and provides police officers, as needed, to accommodate expected increases in the County of Santa Barbara population, which includes the University. In addition, the UCSB Police Department would continue its current practice of cooperating with the Santa Barbara County Sheriff Department and the California Highway Patrol to help ensure the adequacy of police protection services for the University.

Existing police protection services meet the existing demands of the University, and this alternative would not be projected to overburden resources in a manner that would result in public safety concerns. However, the demands placed upon UCPD vary depending on the level of crime in the area, specific events requiring police presence, and the collective demands of the University. The staff of the UCPD can also vary due to cyclical employee turnover. These changing factors result in the potential for the incremental increase in demands from this alternative's faculty and family student housing to decrease the adequacy of the provision of police services. Therefore, following MM 4.15-2 and 4.15-3 would ensure that police protection remains adequate and this impact would be reduced to a *less-than-significant* level. As less residential development would occur, but fewer formalized trails would act as firebreaks, potential impacts would be greater than under the proposed project.

Impact 4.15-3. Implementation of the South Parcel Alternative would increase student enrollment in local schools. This is a *less-than-significant* impact.

Implementation of the residential component of this alternative would increase demands on the high school/junior high school and elementary school districts serving the project site. Table 6-12 summarizes additional students resulting from this alternative. This alternative would result in development of 358 housing units within the North Campus, including 301 multifamily dwelling units and 57 single-family dwelling units. Thus, new housing would result in a total of 27 high school students and 17 junior high school students to the SBHSD as well as a total of 71 elementary school students to the GUSD (refer to Table 6-12). This equates to approximately one classroom in the high school, one classroom in the junior high school, and three classrooms in the elementary school. The addition of students from the housing components of this alternative would further increase demands on the SBHSD and GUSD.

Table 6-12.
Additional Students Generated by the South Parcel Alternative

Student Group	Generation Factor	Additional Students: North Campus Faculty Housing 207 units	Additional Students: Sierra Madre Student Housing 151 units	Total Project
		High School		
Single family	0.1100	15	0	15
Multi family	0.0500	4	8	12
Subtotal	***N/A***	***19***	***8***	***27***
		Junior High School		
Single family	0.0500	7	0	7
Multi family	0.0400	3	7	10
Subtotal	***N/A***	***10***	***7***	***17***
		Elementary School		
Single family	0.2914	40	0	40
Multi family	0.1352	10	21	31
Subtotal	***N/A***	***50***	***21***	***71***
TOTAL	***N/A***	***79***	***36***	***115***

Source: Santa Barbara High School District; Goleta Union School District

Dos Pueblos High School and Goleta Valley Junior High School are part of the SBHSD and serve the project site. Remaining capacities at these schools is 92 students and 213 students, respectively. This alternative would add a total of approximately 44 additional students to the SBHSD. Although no expansion of the schools in the District is planned, transfers within the District are allowed to accommodate additional student enrollment. The SBHSD is currently operating with some remaining capacity, with a total enrollment of approximately 6,074 students. Therefore, the SBHSD schools serving the project site could reasonably accommodate additional students generated by this alternative.

Isla Vista, Ellwood, and Brandon Elementary Schools are part of the GUSD and serve the project site. Remaining capacities at these schools are 33, 15, and 30 students, respectively. This alternative would add a total of approximately 71 additional students to the GUSD. No expansion of the schools in the District is planned, transfers to accommodate additional student enrollment are allowed. The GUSD is currently operating with some remaining capacity, with a total enrollment of approximately 3,792 students. Therefore, the GUSD schools serving the project site could reasonably accommodate additional students generated by this alternative.

An increase in enrollment would not result in overcapacity issues within the SBHSD or GUSD schools serving the site; and this impact would be *less than significant*. Although residential development would be less than the proposed project, slightly more school-aged children would

occur (due to a higher proportion of multifamily dwelling units), and potential impacts would be greater than under the proposed project.

Impact 4.15-4. Implementation of the South Parcel Alternative would not require the construction of new or expanded water treatment facilities but would result in an increase in the amount of water treated. With implementation of the identified mitigation measure, this impact would be *less than significant*.

Development of 358 housing units within the North Campus, including 207 faculty housing units and 151 family student housing units, would result in increased demand for water supplies. With respect to the COPR, habitat restoration and minor trail improvements is not anticipated to result in any increased water demand, as they are proposed to remain in their native state or undergo restoration with drought-tolerant native plants within 50 feet of coastal bluffs, per MM 4.4-9(g). Thus, there would not be any water treatment demands that could occur as a result of trail restoration and coastal access improvements within the COPR and expansion area.

With implementation of MM 4.15-4, the University shall continue to maintain and ensure provision of adequate water treatment facilities, water mains and reclaimed water distribution systems in order to meet campus needs, which would include faculty and student housing developments in the North Campus. As demonstrated in Impact 4.15-6, adequate water supplies exist to serve this alternative. Therefore, implementation of this alternative would not require or result in the construction of new water treatment facilities or the expansion of existing facilities, and this impact would be *less than significant*. Under this alternative, less development would occur than under the proposed project; however residential development under this alternative would still result in an increased need for water supplies, which, in turn, would result in an increased demand for treatment facilities. As less residential development (29 fewer units) would occur, potential impacts would be less than under the proposed project.

Impact 4.15-5. Implementation of the South Parcel Alternative would not include the construction of new stormwater drainage systems, but would include the expansion of existing stormwater drainage systems, the construction of which could result in significant impacts. With implementation of the identified mitigation measures, this impact would be *less than significant*.

As discussed above under Impact 4.3-3, development of faculty housing on the South Parcel would include installation of a culvert on Devereux Creek, under the Venoco Access Road. No other modifications to drainage facilities are proposed, with the exception of minor extension of existing drainage culverts or surface channels, which would accommodate runoff from some locations of project development. Installation of a culvert under the Venoco Access Road, or other minor extensions of existing storm drain facilities would contribute to potentially significant impacts related to construction noise. Implementation of MM 4.13-2, to limit hours of construction, MM 4.13-6(a), to require that stationary construction equipment be located away from residential areas, and MM 4.13-6(b), require signage with contact information for construction noise complaints, would reduce potential construction effects associated with expansion of storm drain facilities. Given the distance of the culvert to residential areas, the

limited extent of improvement and the proposed mitigation measures, noise impacts associated with storm drain facility improvements would be reduced to a less-than-significant level.

With implementation of the identified mitigation measures, implementation of this alternative would expand existing drainage facilities, however their construction would not cause significant environmental effects, and this impact would be reduced to a *less-than-significant* level. As fewer drainage improvements would occur, potential impacts would be less than the proposed project.

Impact 4.15-6. Implementation of the South Parcel Alternative would generate an additional demand for water, but would not require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements. With implementation of identified mitigation measures, this impact would be *less than significant*.

This alternative would result in increased water demands as shown in Table 6-13. This alternative would result in total demand of 66,230 gallons per day (gpd), which is the equivalent of 74.2 AFY. This alterative is served by the Goleta Water District (GWD), which released a 200 AFY entitlement for potable water on the North Campus to the University. Given project demand, the 200 AFY surplus designated for the project site would be adequate to serve the water demand of this alternative.

Table 6-13.
South Parcel Alternative Water Demands

Use	Density	Water Demand Factor	Demand
Faculty Housing	207 units	185 gpd	38,295 gpd
Married Student Housing	151 units	185 gpd	27,935 gpd
Open Space Plan	0	0	0
Total	**358 units**	**N/A**	**66,230 gpd**

Source: UCSB Campus Energy, EIP Associates

GWD obtains/purchases reclaimed water from the Goleta Sanitary District. In 1991, UCSB entered into an agreement with GWD to have the first right of refusal to 280 AFY of reclaimed water for the entire University. Since 1994, the University has used an average of 123 AFY of reclaimed water (Dewey, 2003). Therefore, adequate reclaimed water entitlements also exist to serve the landscape irrigation needs of this alternative (Ruiz, 2003).

With implementation of MM 4.15-4, this alternative would be required to develop water mains, reclaimed water distribution systems, and water treatment facilities in order to meet University needs. MM 4.15-6(a) through (d) would ensure appropriate implementation of water conservation measures. Therefore, with a 200 AFY water entitlement surplus, implementation of this alternative would not require new or expanded water entitlements and resources. Impacts on

water supply would be *less than significant*. Under this alternative, less development would occur than under the proposed project, and potential impacts would be less than the proposed project.

Impact 4.15-7. Implementation of the South Parcel Alternative would generate solid waste that would not require the expansion of the permitted capacity of a regional landfill. With implementation of the identified mitigation measure, this impact would be *less than significant*.

Development of 358 housing units within the North Campus would result in increased generation of solid waste. County of Santa Barbara Public Works utilizes the California Integrated Waste Management Board (CIWMB) solid waste generation factor of 2.04 tons per unit per year for single-family units and 1.17 tons/unit/year for multifamily units (Rendell, 2003). Thus, the faculty and student housing components of this alternative would increase solid waste generation by 469 tons per year, as shown in Table 6-14.

Table 6-14.
South Parcel Alternative Solid Waste Demands

Use	Density	Solid Waste Demand Factor	Demand
Faculty Housing			
Single-family units	57 units	2.04 tons/unit	116 tons
Multifamily units	150 units	1.17 tons/unit	176 tons
Married Student Housing	151 units	1.17 tons/unit	177 tons
Open Space Plan	0	0	0
Total	**358 units**	**N/A**	**469 tons**

Source: California Integrated Waste Management Board, EIP Associates

The 469 tons generated by the South Parcel Alternative represents 1.28 tons per day, or .18 percent of the average daily disposal at the Tajiguas Landfill. Implementation of the COPR Management Plan would result in minor solid waste generation from recreational use of the COPR and expansion area, as they are proposed to remain in their native state, but with the provision of amenities such as trashcans along the trails. Thus, minor additional solid waste generation would occur from the COPR implementation component of this alternative; however this open space solid waste generation would be less than under the proposed project's implementation of the OSHMP.

Implementation of MM 4.15-7 would assure continued implement of applicable solid waste reduction and recycling programs. Therefore, implementation of this alternative would not require expansion of the permitted capacity of the regional landfill, and this impact would be *less than significant*. Under this alternative, less development would occur than under the proposed project; and potential impacts would be less than under the proposed project.

Impact 4.15-8. Implementation of the South Parcel Alternative would comply with all applicable federal, State, and local statutes and regulations related to solid waste. With implementation of the identified mitigation measure, this impact would be *less than significant*.

The University remains committed to continue existing waste reduction and minimization efforts. MM 4.15-7, discussed above, recommends inclusion of this alternative in the University's existing solid waste reduction and recycling program. Compliance with this mitigation measure would ensure compliance with State-mandated solid waste reduction efforts, and this impact would be reduced to *less-than-significant* levels. Under this alternative, less development would occur than under the proposed project, potential impacts would be comparable to the proposed project.

Impact 4.15-9. Implementation of the South Parcel Alternative would not exceed wastewater treatment requirements of the RWQCB. This impact would be *less than significant*.

Development of 358 housing units within the North Campus would result in increased generation of wastewater. UCSB has received, and complies with, all provisions of its wastewater permits. In addition, UCSB would continue to obtain and comply with all provisions of wastewater permits required for development of this alternative.

Implementation of MM 4.15-9 would ensure compliance with the applicable requirements of the Central Coast RWQCB. Therefore, this alternative would not exceed wastewater treatment requirements of the RWQCB. Impacts would be reduced to *less-than-significant* levels**.** Under this alternative, less development would occur than under the proposed project; however residential development under this alternative would still result in an increased generation of wastewater. As less residential development (29 fewer units) and no restrooms in the open space areas but compliance with applicable requirements of the RWQCB would occur under this alternative, potential impacts would be comparable to the proposed project.

Impact 4.15-10. Implementation of the South Parcel Alternative could require the construction of new or expanded wastewater conveyance systems (e.g., trunk lines), but would not require expansion of wastewater treatment facilities. With implementation of identified mitigation measures, this impact would be *less than significant*.

Development of 358 housing units within the North Campus would result in increased demand for water supplies and, thus, increased wastewater generation. GWSD as well as the University utilizes a wastewater generation factor of 168 gallons per day (gpd) of water per residential unit. Thus, the housing component of this alternative would increase University wastewater generation by 60,144 gpd in total, as shown in Table 6-15, below. Based on existing available capacity of 2.14 mgd, there remains adequate capacity within the local treatment plant to serve both housing developments of this alternative.

Table 6-15.
South Parcel Alternative Wastewater Generation

Use	Density	Wastewater Demand Factor	Demand
Faculty Housing	207 units	168 gpd	34,776 gpd (0.03 mgd)
Family Student Housing	151 units	168 gpd	25,368 gpd (0.03 mgd)
Open Space Plan	0	0	0
Total	**358 units**	**N/A**	**60,144 gpd**

Source: Goleta West Sanitary District, EIP Associates

Implementation of the COPR Management Plan would not entail structural development. Thus, no additional wastewater would be generated within the COPR or expansion area.

With implementation of MM 4.15-4, the campus would continue to maintain and ensure provision of adequate wastewater conveyance systems and treatment facilities in order to meet University needs for faculty and student housing developments in the North Campus. Implementation of this alternative would result in connection to existing wastewater conveyance systems. With implementation of MM 4.15-6(a) through (d) to minimize water use, and, therefore, wastewater generation, this alternative would not require expansion of wastewater conveyance or treatment facilities, and this impact would be reduced to a *less-than-significant* level. Under this alternative, less development would occur than under the proposed project; however residential development under this alternative would still result in an increased generation of wastewater. As less residential development (29 fewer units) and no restrooms in the open space areas would occur under this alternative, potential impacts would be less than under the proposed project.

Impact 4.15-11. Implementation of the South Parcel Alternative would not increase wastewater generation such that treatment facilities would be inadequate to serve the project's projected demand in addition to the provider's existing commitments. With implementation of identified mitigation measures, this impact would be *less than significant*.

The project area is served by the Goleta Sanitary District's Wastewater Treatment Plant. As discussed previously, the remaining capacity in the University's portion of the Goleta Wastewater Treatment Plant is 0.142 mgd, and the remaining capacity in the GWSD's portion of the Plant 1.12 mgd. Faculty housing and family student housing would generate 0.03 and 0.03 mgd, respectively. Thus, wastewater treatment plant capacity would be adequate to serve this alternative's residential development. However, the faculty housing would connect to a GWSD operated sewer trunk line, and the GWSD would not be able to meter flows from the faculty housing separately from other wastewater discharging into this trunk line. Therefore, this alternative would use a portion of GWSD's share of the Goleta Sanitary District's Wastewater Treatment Plant capacity. Adequate capacity currently exists to meet all wastewater demands placed on the treatment plant from this alternative. However, in order to ensure that the

University does not result in limiting the GWSD's ability to serve their service area, MM 4.15-11 would be implemented.

With implementation of MM 4.15-11, this alternative would not generate wastewater that would exceed the capacity of the Goleta Sanitary District's Wastewater Treatment Plant in combination with the provider's existing service commitments, and this impact would be reduced to a *less-than-significant* level. Under this alternative, less development would occur and potential impacts would be less than under the proposed project.

Impact 4.15-12. Implementation of the South Parcel Alternative would increase the demand for electricity and require extension of existing infrastructure such as transmission lines, but would not require or result in the construction of new energy production or transmission facilities, the construction of which could cause a significant environmental impact. With implementation of identified mitigation measures, this impact would be *less than significant*.

Development of 358 housing units within the North Campus would result in increased demand for electricity. SCE employs a usage factor of 5,626.50 kilowatt-hours/unit/year (SCAQMD, 1993). Thus, the housing components of this alternative would increase electricity demand by 2.01 million kilowatt-hours per year, as shown in Table 6-16. Rule 15 line extensions from the circuits along Storke Road would adequately serve proposed residents of this alternative's housing developments (Barkly, 2003). Therefore, this alternative's development of residential units would generate demand for electricity, which would be accommodated by existing electrical transmission facilities, although extension of service to the project site may be necessary.

Table 6-16.
South Parcel Alternative Electricity Demands

Use	Density	Electricity Demand Factor	Demand
Faculty Housing	207 units	5,620.50 KWh/unit/year	1,163,444 KWh/year
Married Student Housing	151 units	5,620.50 KWh/unit/year	848,696 KWh/year
Open Space Plan	0	0	0
Total	**358 units**	**N/A**	**2,012,140 KWh/year**

Source: SCAQMD, EIP Associates

This alternative would comply with the conservation requirements of Title 24 of the California Code of Regulations (CCR) and the recently enacted UC Green Building Policy and Clean Energy Standard, which requires energy conservation measures to exceed Title 24 standards by 20 percent. As such, residential development would include provision of energy conservation amenities to reduce increased electrical demand, and this alternative would not require or result in the construction of new electrical production or transmission facilities, and this impact would

be reduced to a *less-than-significant* level. Under this alternative, less development would occur and potential impacts would be less than the proposed project.

Impact 4.15-13. Implementation of the South Parcel Alternative would increase the demand for natural gas, but would not require or result in the construction of new gas production or transmission facilities, the construction of which could cause a significant environmental impact. With implementation of identified mitigation measures, this impact would be *less than significant*.

Development of 358 housing units within the North Campus would result in increased demand for natural gas. The Southern California Gas Company employs a usage factor of 6,665.0 cubic feet/unit/month for single-family housing and 4,011.5 cubic feet/unit/month for multifamily housing (SCAQMD, 1993). Thus, the housing components of this alternative would increase natural gas demand by 1.59 million cubic feet per month, as shown in Table 6-17. With a proposed population of 928, one- or two-inch line extensions from the lines within Storke Road would adequately serve proposed residents of this alternative (Mahoney, 2003).

Table 6-17. South Parcel Alternative Natural Gas Demands

Use	Density	Natural Gas Demand Factor	Demand
Faculty Housing			
Single-family units	57 units	6,665.0 feet^3/unit/month	379,905 feet^3/month
Multifamily units	150 units	4,011.5 feet^3/unit/month	601,725 feet^3/month
Married Student Housing	151 units	4,011.5 feet^3/unit/month	605,737 feet^3/month
Open Space Plan	0	0	0
Total	**358 units**	**N/A**	**1,587,367 feet^3/month**

Source: SCAQMD, EIP Associates

Implementation of the COPR Management Plan would not entail development of structures or roads. As such, no additional natural gas demands would occur within the COPR and expansion area.

With adherence to the UC Green Building Policy and Clean Energy Standard, this alternative would not require or result in the construction of new natural gas production or transmission facilities, and this impact would be reduced to a *less-than-significant* level. Under this alternative, less development would occur and potential impacts would be less than under the proposed project.

Impact 4.15-14. Implementation of the South Parcel Alternative would not result in the wasteful or inefficient use of energy. With implementation of identified mitigation measures, this impact would be *less than significant*.

With adherence to the UC Green Building Policy and Clean Energy Standard, this alternative would not result in wasteful or inefficient use of energy, and this impact would be *less than significant*. Under this alternative, less development would occur and potential impacts would be less than under the proposed project.

6.4.2.16 Population and Housing

Impact 4.16-1. Implementation of this alternative would not directly induce substantial population growth in the area by providing additional housing for faculty and student families or indirectly by improving coastal access or improving management of open space. This impact would be *less than significant*.

Development of 358 housing units would not directly induce substantial population growth in the area by providing additional housing for faculty and student families or indirectly by improving coastal access or improving management of open space. An increase in housing of 358 units, representing a potential increase of 927 residents under this alternative would not represent a substantial increase in population growth in the area, relative to the overall population of the area. The increase in residential occupants of the area and recreational visitors to open space areas could increase demand for retail goods and services from commercial establishments in the vicinity of this alternative area. Increased demand for retail goods and services could indirectly induce population growth in the area; however, given the relatively minor increase in on-site residential population in relation to area population, this alternative would not indirectly induce substantial population. The extension of roads and infrastructure associated with this alternative development would only serve this alternative area and would not indirectly induce growth of any areas adjacent to this alternative. Implementation of this alternative would not directly or indirectly induce substantial population growth, and this impact would be less than significant. As fewer residential units would be provided, potential impacts would be less than the proposed project.

6.4.2.17 Relationship to Project Objectives

This alternative would meet the following the project objectives:

- Provide a variety of additional University-owned faculty housing to meet long-term demand for affordable faculty housing and thereby enable the University to recruit and retain a superior quality of and diverse faculty.
- Provide additional University-owned family-student housing to meet demand for affordable family student housing, and enable the retention of a broad selection of qualified students.
- Provide on-campus housing to support closer linkages between residential and academic functions and reduce the number and length of vehicle trips associated with commuting.
- Create attractive new residential neighborhoods for faculty and their families and student families that are compatible with existing adjacent residential uses.

- Integrate the proposed family-student housing with the existing West Campus Family Student Apartments Family Student Housing to enhance the existing facilities and create a shared sense of community.
- Create attractive new residential neighborhoods for faculty and their families and student families that are compatible with existing adjacent residential uses.
- Integrate the proposed family-student housing with the existing West Campus Family Student Apartments Family Student Housing to enhance the existing facilities and create a shared sense of community.
- Provide a mix of townhome, duplex, studio, and detached single-family homes for faculty, to respond to demand for varied housing types.
- Implement restoration opportunities and physical improvements identified in the Coal Oil Point Natural Reserve Management Plan.

This alternative would not or would only partially meet the following the project objectives

- Maximize the ability of the North Campus to meet identified campus housing needs.
- Develop much-needed housing in such a manner as to preserve and protect the natural setting of the Coal Oil Point Reserve and other sensitive coastal resources.
- Implement proposed project components of the Joint Proposal and Open Space Plan within the University's jurisdiction and thereby provide an open space, habitat, and development plan that is, on balance, most protective overall of sensitive natural and coastal resources and assures improved public coastal access and the preservation and enhancement of 652 contiguous acres of open space, natural reserve, and marine environment resources.
- Protect, enhance, and restore key natural, cultural, and scenic resources using an integrated ecosystems approach.
- Provide for improved public access and compatible passive recreation, consistent with the conservation of significant coastal resources.
- Protect Devereux Creek, Devereux Slough and the adjacent upland and marine habitats.
- Preserve and protect and restore identified sensitive habitat areas, including wetland, native grassland, dune, back dune, and freshwater pond habitat.
- Provide residential and open space land uses that are consistent, to the extent feasible, with the California Coastal Act policies, and with the prior development plans and expectations for the West Devereux property (now the University's North Campus) that was set forth for this area through standards in the Santa Barbara County Local Coastal Plan.

6.4.3 Alternative 2: No Project—No Development

6.4.3.1 Description

Under the No Project/No Development Alternative, the LRDP would not be amended and the proposed project would not be implemented. No residential development would occur on either the North Parcel or the Storke-Whittier Parcel, and none of the management actions identified in the Open Space Plan would occur. Under this alternative, it is assumed that the existing Draft COPR Management Plan would remain in effect; however, no physical improvements identified in the plan (e.g., boardwalks) would occur.

6.4.3.2 Comparison of Environmental Effects

The North Campus would not be developed for faculty housing or family student housing, nor would any coastal access improvements occur. No coastal access improvements and open space management activities, including habitat restoration, would occur on the South Parcel, Coal Oil Point, or the West Campus Bluffs and Mesa. Thus none of the benefits associated with management of Open Space areas that would result under the proposed project would occur.

As no development or improvements would occur on the approximately 383 acres of land that comprise the North and West Campuses, none of the potentially adverse or potentially beneficial impacts of the proposed project would occur under this alternative.

Under Alternative 2, future conditions in the vicinity of the proposed site would generally be the same as existing conditions, which were described in the environmental setting section for each environmental topic in Chapter 4. None of the significant unavoidable impacts of the proposed project would occur. However, as no trail improvements or habitat restoration would occur, the existing informal network of trails could continue to expand (and deteriorate via erosion) and habitat deterioration (e.g., from invasive and nonnative species) and fragmentation (from the numerous trails) would continue. Continued erosion of Open Space areas would contribute sediment to the tributaries of Devereux Creek and the Devereux Slough, contributing to poor water quality and reducing tidal inflow in the slough.

6.4.3.3 Relationship to Project Objectives

Selection of the No Project/No Development Alternative would not meet any of the project objectives identified in Chapter 3 (Project Description), as no new housing would be developed and management of the Open Space areas would not be improved, and the beneficial impacts of the Joint Proposal and associated open space plan would not be realized. Without provision of additional faculty housing, the University's ability to recruit and retain faculty would be constrained.

6.4.4 Alternative 3: North and South Parcel Development—Existing LRDP

6.4.4.1 Description

This alternative assumes that the existing 1990 LRDP, as amended in 1998, would remain in effect. Under this alternative, 147 units of faculty housing would be developed on the North Parcel, 122 units of faculty housing would be developed on the South Parcel, and 144 units of student housing would be developed on the Storke-Whittier Parcels, for a total of 413 units (compared to 387 units for the proposed project). Development of housing would result in disturbance of approximately 23.6 acres of land on the North Parcel, 31 acres of land on the South Parcel and 12.5 acres of land on the Storke-Whittier Parcels (including the parcel west of the Ocean Meadows Golf Course parking lot), for a total of up to 67.1 acres (compared with approximately 43.3 acres for the proposed project.) The COPR Draft Management Plan would be implemented; however, other coastal access improvements and open space management activities outside of the Reserve area would be fewer than the proposed project and would be limited to those identified in the North and West Campus Housing LRDP Amendment Final EIR (UCSB, 1998). This alternative provides for a plan-to-plan comparison of the 1990 LRDP (as amended) and the proposed project (a revised LRDP amendment), per Section 15126.6(e)(3)(A) of the CEQA Guidelines. To mitigate existing and potential flooding impacts, it is assumed that modifications to Phelps Ditch and installation of a culvert on Devereux Creek would occur, similar to the proposed project.

Comparison of the environmental effects of this alternative to the proposed project follows. Where appropriate, this analysis relies on the conclusions of the Final EIR for the UCSB North and West Campus Housing LRDP Amendment Final EIR. This analysis assumes that relevant mitigation measures identified for the proposed project would be implemented.

6.4.4.2 Geology and Geologic Hazards

Under this alternative, development of 413 residential units and implementation of the COPR Management Plan could expose people and/or structures to potentially adverse effects related to seismic ground shaking (Impact 4.2-1), including potential effects from the North Branch More Ranch Fault. Implementation of MM 4.2-1(a) (setback from coastal bluffs), MM 4.2-1(b) (adherence to recommendations of a project-specific geotechnical report, and MM 4.2-1(c) (setbacks from potential hazards based on geotechnical studies) would reduce potential impacts to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, construction of residential structures on approximately 67.1 acres and implementation of the COPR Management Plan could result in substantial soil erosion and the loss of topsoil (Impact 4.2-2). Under this alternative, erosion during construction would be minimized by incorporating all recommendations regarding erosion potential outlined in geotechnical and soil analyses prepared for residential developments under MM 4.2-1(c). In addition, implementation of MM 4.2-2(a) through 4.2-2(e) during development of this alternative

would further reduce effects from erosion, and impacts would be reduced to a *less-than-significant* level. As development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, development of residential structures on approximately 67.1 acres and implementation of the COPR Management Plan could occur on soils of varying soil and slope stability (Impact 4.2-3). While project development as proposed could potentially result in exposure of structures or people to hazards of geological instability, implementation of the MM 4.2-1(a) through 4.2-1(c), would reduce this impact to a *less-than-significant* level. As development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, development of residential structures on approximately 67.1 acres and implementation of COPR Management Plan could occur in areas underlain with expansive soils (Impact 4.2-4). The University would implement MM 4.2-1(c), to require a site-specific geotechnical study including analyses of soils at development sites and incorporation of recommendations to reduce potential geologic hazards. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

6.4.4.3 Hydrology and Water Quality

Under this alternative, development of residential structures on approximately 67.1 acres and implementation of the COPR Management Plan within the project area would not violate existing water quality standards or waste discharge requirements (Impact 4.3-1). To reduce potential impacts to water quality from construction and operation, the University would comply with the requirements of the campus' Storm Water Management Plan (SWMP). Prior to the start of construction of any project component that would result in the disturbance of one acre or greater, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared. With compliance with the campus Storm Water Management Plan, the proposed project would not violate any water quality standards or waste discharge requirements, and this impact would be *less than significant*. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Development of residential structures on approximately 67.1 acres and implementation of the COPR Management Plan within the project area would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge (Impact 4.3-2). With an assumption of 50 percent coverage as part of development plans, this alternative would result in approximately 33.55 acres of additional impervious surface (greater than the proposed project). The increase in impervious surface (of approximately 8.5 percent of the total project area) would not result in substantial decrease in groundwater recharge. Development of 413 residential units would increase demand for potable water, which would result in a minor increase for groundwater; however, this increase would not substantially deplete groundwater supplies, and

this impact would be *less than significant*. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, residential development and implementation of the COPR Management Plan would not substantially alter site drainage patterns or result in substantial erosion or siltation on or off site (Impact 4.3-3). Residential development would result in a new drainage system to control runoff from impervious surfaces over a 67.1-acre area; however, runoff would be discharged into Devereux Creek and its tributaries, as with existing conditions. Under this alternative, the University would implement applicable provisions of the SWMP to control erosion during construction and operation. Although implementation of this alternative would not substantially alter the existing drainage pattern of the site or area, the installation of a culvert on Devereux Creek could result in substantial erosion of sediments within Devereux Creek and siltation within the Devereux Creek in the short term. To reduce potential soil erosion during construction of the culvert, MM 4.3.3(a) to require installation during the dry season, MM 4.3.3(b) to stabilize exposed soil surfaces, and MM 4.3.3(c) to stabilize adjacent portions of the channel would be implemented, and this impact would be reduced to a *less-than-significant* level. However, as residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, residential development and implementation of the COPR Management Plan would not substantially alter site drainage patterns or substantially increase the rate or amount of surface runoff and thus result in flooding either on or off site (Impact 4.3-4). Residential development would increase impervious surfaces within the project area by approximately 33.5 acres, which would increase stormwater runoff that would be discharged into Devereux Creek and its tributaries; however, this increase would not be substantial in relation to existing discharge from the project area, and this impact would be *less than significant*. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Residential development and implementation of the COPR Management Plan would not create runoff that would exceed the capacity of existing storm drain systems or provide substantial sources of polluted runoff (Impact 4.3-5). Residential development would increase impervious surfaces within the project area by approximately 33.5 acres and thereby increase stormwater runoff that would be discharged into Devereux Creek and its tributaries; however, existing upstream drainage facilities, including tributaries to Devereux Creek, would not require expansion. Under this alternative, the University would prepare a SWPPP for components of this alternative that would disturb one acre or greater and implement applicable provisions of the UCSB SWMP. In addition, the University would install a culvert on Devereux Creek to increase discharge capacity and reduce upstream flooding potential, and this impact would be *less than significant*. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Installation of a culvert on Devereux Creek and modifications to Phelps Ditch to increase discharge capacity and reduce upstream flooding potential could result in adverse impacts to

riparian vegetation in an upstream debris basin. Implementation of MM 4.4-2(d) (Wetlands and Environmentally Sensitive Habitat Restoration Plan), discussed in Section 4.4 (Biological Resources) would reduce potential adverse impacts. With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, residential development and implementation of the COPR Management Plan would not otherwise substantially degrade water quality (Impact 4.3-7). Under this alternative, the University would prepare a SWPPP for project components that would disturb one acre or greater, implement applicable provisions of the UCSB SWMP, and implement MM 4.3-1, to require compliance with applicable water quality requirements established by the Central Coast RWQCB. With implementation of the identified mitigation measure, this impact would be *less than significant*. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Development of faculty housing on the North and South Parcels and student family housing on the Storke-Whittier Parcel would not place housing within a 100-year flood hazard area (Impact 4.3-8). Modification of the Phelps Ditch and installation of a culvert on Devereux Creek under the Venoco Access Road would reduce the 100-year flood hazard elevation level and no residential development would occur within a flood hazard area, and this impact would be *less than significant*. As more residential units would be developed, potential impacts would be greater than the proposed project.

Structures would not be placed within a 100-year flood hazard area that could impede or redirect flood flows (Impact 4.3-9). Modification of Phelps Ditch and installation of a culvert on Devereux Creek would be designed to improve discharge and would not impede or redirect flood flows, and this impact would be *less than significant*. As no bridge would be developed over Devereux Creek, potential impacts would be less than the proposed project.

Under this alternative, residential development and implementation of the COPR Management Plan would alter site drainage patterns but not expose people or structures to significant risk of loss, injury, or death involving flooding (Impact 4.3-10). With implementation of the proposed modification to Phelps Ditch and installation of a culvert on Devereux Creek, no housing would be placed within a 100-year flood hazard zone and upstream flooding impacts would be reduced, and this impact would be *less than significant*. As more residential development would occur, potential impacts would be greater than the proposed project.

Under this alternative, residential development and implementation of the COPR Management Plan would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow (Impact 4.3-11). None of the project area is located near a body of water of sufficient size to pose a risk from seiche. In addition, overall slopes within the project site are not sufficiently great to create substantial risks from mudflows. As most of the project area is above the estimated tsunami inundation elevations in the Santa

Barbara area (approximately 5.5 feet for a 100-year event and approximately 11 feet for a 500-year event), this impact would be *less than significant*. Although more development would occur under this alternative, the risks would not increase and potential impacts would be comparable to the proposed project.

6.4.4.4 Biological Resources

Under this alternative, residential development and implementation of the COPR Management Plan would result in adverse impacts to candidate, sensitive, or special status plant and wildlife species (Impact 4.4-1). Residential development on the North Parcel, South Parcel, and the Storke-Whittier Parcels would result in the disturbance of approximately 67.1 acres, compared to approximately 43.3 acres for the proposed project. The loss of undeveloped areas would remove special status plants and habitats, remove and modify raptor foraging areas and potential nesting sites, and potentially increase unmanaged human presence in the area, which could lead to increased disturbance of special status species such as western snowy plover and Belding's savanna sparrow. Under this alternative, the University would continue LRDP programs and policies and implement MM 4.4-1(a) through 4.4-1(o), and MM 4.4-2(e), which would reduce potential adverse effects, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations; or by the CDFG or USFWS to *less-than-significant* levels. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, residential development and implementation of the COPR would result in substantial adverse effects on sensitive natural communities (Impact 4.4-2). Residential development on the North Parcel, South Parcel, and the Storke-Whittier Parcels would occur over an area of approximately 67.1 acres. Open space management would occur in limited portions of the project area (i.e., within the COPR and expansion area). Residential development and open space management could adversely affect special status habitats, including riparian habitats and their channels, native grasslands, southern vernal pools, freshwater marsh, and Venturan coastal sage scrub. With implementation of MM 4.4-1(a) through 4.4-1(o), and MM 4.4-2(a) through 4.4-2(e), this alternative would not result in a substantial adverse effect to in the modification or removal of vegetation communities or habitats that are designated and/or identified as sensitive by the CDFG, USFWS, California Costal Commission (CCC), and/or local agencies, and this impact would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Residential development would result in substantial adverse effects on federally protected wetlands through direct removal, placement of fill, or hydrological interruption (Impact 4.4-3). Residential development would occur on the North Parcel, South Parcel, and the Storke-Whittier Parcels (including the area west of the parking lot for the Ocean Meadows Golf Course). For this alternative, it is assumed that wetland impacts on the North Parcel would be comparable to the proposed project. No impacts to wetlands would occur on the South Parcel. It is assumed that impacts to wetlands on the Storke-Whittier (South) Parcel would be

comparable to the proposed project. Residential development west of the parking lot for the Ocean Meadows Golf Course (on the Storke-Whittier North Parcel) would result in the removal of an additional 0.48 acres of Section 404 wetlands and 0.51 acres of California Coastal Act wetlands. With required federal and State permitting and implementation of MM 4.4-1(a) through MM 4.4-1(o), and 4.4-2(d), this alternative would not result in a substantial adverse effect on federally protected wetlands through direct removal, filling, or hydrological interruption, and this impact would be reduced to a *less-than-significant* level. As residential development under this alternative would occur west of the parking lot of the Ocean Meadows Golf Course, potential impacts would be greater than the proposed project.

Residential development could interfere with the movement of native resident or migratory wildlife species, including migratory birds and raptors (Impact 4.4-4). Residential development on the North Parcel, South Parcel, and the Storke-Whittier Parcels would occur over an area of approximately 67.1 acres. Compared to the proposed project, development on the South Parcel would result in the loss of additional undeveloped open space, which provides forage areas for raptors. More limited improvement of open space under this alternative would result in a reduced extent of habitat restoration (compared with that which would occur under the proposed project). This would decrease the connectivity of the surrounding landscape and further restrict and limit both wildlife movement and dispersal. The University would minimize exterior lighting per MM 4.9-4(b). Temporary fencing would be associated with construction activities, but this fencing would be minimal and occur over the short term, and would not significantly impact the movement of wildlife species. Therefore, this alternative would not interfere with the movement of native resident or migratory wildlife species or corridors, and potential impacts would be reduced to a *less-than-significant* level. However, since a larger land area would be subject to development, potential impacts on wildlife movement would be greater than the proposed project

Under this alternative, residential development and implementation of the COPR Management Plan would be in substantial conformance with local applicable policies protecting biological resources (Impact 4.4-5). As a state entity, UCSB is not subject to municipal plans, policies, and regulations, such as the County and City General Plans or local ordinances, and this impact would be *less than significant*. Therefore, potential impact would be the same as for the proposed project.

Residential development and implementation of the COPR Management Plan would not conflict with the provisions of an applicable habitat conservation plan (Impact 4.4-6). As there are no existing HCPs, NCCPs, or other approved local, regional, or state habitat conservation plans that are applicable to this alternative's area, *no impact* would result. Therefore, potential impacts would be the same as for the proposed project.

6.4.4.5 Hazards and Hazardous Materials

Under this alternative, development of 413 housing units on 67.1 acres could expose campus occupants or the public to significant hazards due to the routine transport, use, disposal, or

storage of hazardous materials (Impact 4.5-1). This alternative could result in potential exposure of residential occupants and the public to hazards associated with the routine transport, use, disposal, or storage of hazardous materials associated with the existing EMT. Federal and State laws and regulations strictly regulate generation, handling, transportation, and disposal of hazardous materials and waste, and these requirements apply to operations of the Ellwood Marine Terminal, and compliance is overseen by the County of Santa Barbara. The campus has programs in place to ensure compliance with applicable laws and regulations and provides emergency clean-up procedures if an accidental exposure or spill occurs, therefore risks resulting from the routine use and transport of hazardous materials remain *less than significant*. As residential development would occur on the South Parcel, in greater proximity to the EMT, potential impacts would be greater than the proposed project.

Under this alternative, construction of residential development could expose workers to health and safety risks through earthmoving activities in areas with potentially contaminated soils or groundwater (Impact 4.5-2). Consistent with applicable statutes, ongoing University procedures for handling hazardous wastes would be extended to all new development associated with the proposed project. In addition, MM 4.5-2 would require continued implementation of health and safety plans, programs, and procedures related to the use, storage, disposal, or transportation of hazardous materials related to accidental exposure during construction activities and this impact would be reduced to as *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, construction of residential development could expose construction workers, occupants of new residential structures and recreational users of open space to the naturally occurring hazards of Radon-222, natural gas and oil seeps (Impact 4.5-3). Implementation of MM 4.5-3 would ensure identification of radon gas in areas of proposed development, if it exists, and incorporation of radon control systems to minimize risks from the gas, if present. In addition, implementation of MM 4.5-2 would ensure appropriate steps are taken in the event that radon gas or natural oil or gas seeps are encountered during construction and this impact would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, potential impacts would be greater than the proposed project.

Under this alternative, construction of residential development could expose construction workers and the public to potential health risks associated with abandoned oil wells (Impact 4.5-4). Construction of residential structures would result in construction in areas with known former wells and could also result in discovery of unknown abandoned oil wells. The potential risks, if any, would be reduced by implementation of MM 4.5-4(a) and 4.5-4(b) which ensure site characterization, well re-abandonment, and procedures in the event of discovery of oil wells, and this impact would be reduced to a *less-than-significant* level. Since development over a larger area would occur under this alternative, potential impacts would be greater than the proposed project.

Under this alternative, recreational use of open space area could expose the public to potential health risks in the event of the accidental discovery of an abandoned oil well (Impact 4.5-5). If

abandoned oil wells are encountered by recreational users of open space, the campus EH&S would comply with hazardous material and hazardous waste laws and regulations. In addition, implementation of MM 4.5-4(a) and 4.5-4(b) would ensure site characterization, well re-abandonment, and procedures for accidental release of petroleum or hydrocarbon substances and this impact would be reduced to a *less than significant* level. Because open space improvements would be reduced (compared to the proposed project), the potential risks of accidental discovery of an abandoned oil well would be reduced, and potential impacts would be less than the proposed project.

Under this alternative, residential development could expose the public to potential health risks in the event of an accident or accidental release from the EMT (Impact 4.5-6). An accident, including fire, or accidental release of petroleum stored within the two tanks at the EMT, or in the pipelines running along the western edge of the UCSB property, could expose the public to potential health risks. Implementation of MM 4.5-6 would require that no residential structures be placed within 585 feet of the nearest EMT storage tank and this impact would be reduced to a *less-than-significant* level. Due to residential development on the South Parcel, persons would be residing in closer proximity to the EMT, and potential impacts would be greater than the proposed project.

Under this alternative, residential development would not result in construction on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Impact 4.5-7). Based upon review of federal, State, and County hazardous waste lists and databases, one known hazardous materials site (the EMT or Venoco lease site) exists within the project area. No residential development or other construction activities would occur within the EMT. Thus, this alternative would not involve construction on any site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and there would be *no impact*. Although construction would occur in closer proximity to the EMT, no construction activities or disturbance would occur within the EMT, and potential impacts would be comparable to the proposed project.

This alternative would not result in a significant safety hazard for people residing or working in the project area associated with proximity to the Santa Barbara Municipal Airport (Impact 4.5-8). The project area is entirely within the Airport Influence Area (AIA) and partially within the Approach Zone of the Santa Barbara Municipal Airport. Under this alternative, a greater number of persons would be exposed to potential hazards associated with aircraft flyovers. However, use of the residential units would not result in a hazard in and of itself. Rather, the concentration of persons on site resulting from higher density uses would expose more persons to potential hazards, should an incident occur. The University maintains an Emergency Operations Plan, which is designed to assist preparation and response to all levels of emergencies. Thus, with continued implementation of public safety and emergency operation procedures, this impact would be *less than significant*. As more persons would reside within the project area, potential impacts would be greater than the proposed project.

This alternative could impair implementation of, or physically interfere with, an adopted emergency response plan (Impact 4.5-9). Construction and operation activities associated with this alternative could potentially affect emergency response or evacuation plans. Implementation of MM 4.5-9(a) and 4.5-9(b) would provide multiple emergency access or evacuation routes, revisions to the EOP as necessary, and coordination of roadway or travel lane closures with emergency response personnel, and this impact would be *less than significant* by As residential development on the South Parcel would have less emergency, potential impacts would be greater than the proposed project.

This alternative could expose people or structures to a risk of loss, injury, or death involving wildland fires (Impact 4.5-10). Under this alternative, residential development would occur on the North Parcel, the South Parcel, and the Storke-Whittier Parcels, which would expose more structures to risk of loss, injury, or death involving wildland fires. Implementation of MM 4.6-10(a) and MM 4.6-10(b) would reduce potential increased risk of wildland fires through landscaping techniques and adherence to fuel management procedures, and this impact would be reduced to a *less-than-significant* level. As more locations would be developed with residential structures, potential impacts would be greater than the proposed project.

6.4.4.6 Land Use

This alternative would be largely consistent with applicable land use plans, policies, and regulations (Impact 4.6-1). Consistency of the development of 413 housing units on approximately 67.1 acres of land and open space improvements with each applicable plan is discussed below.

- California Coastal Act. With respect to the applicable policies of the California Coastal Act, as the North and West Campus areas are located within the Coastal Zone, this alternative would, on balance, ensure protection of the most significant coastal resources. This alternative would result in inconsistencies with policies expressed in the Coastal Act including Sections 30233 and 30255 related to filling of wetlands, and Section 30251 related to protection of visual resources. This alternative would result in a greater potential impacts than the proposed project, as residential development would not be clustered adjacent to existing development, development on the South Parcel would fragment the current undeveloped area impacting its scenic and recreational value, more housing would be developed, and less land set aside as open space.
- Goleta Community Plan. This alternative is largely consistent with the development standards in the Local Coastal Plan portion of the GCP. Although this alternative may not be consistent with policy LUDS-GV-2.13, which specifies a 200-foot buffer from the Venoco access road, the inconsistency of the proposed LRDP amendment with GCP development standards does not constitute a significant impact. The GCP is not a governing land use document for the University; rather, this evaluation of those standards is provided for informational purposes only.

- Regional Growth Forecast. This alternative is consistent with the relevant recommended policies regarding the county's jobs-housing balance as presented in the Santa Barbara County Association of Governments, Regional Growth Forecast 2000 (RGF). While these policies have not been formally adopted, in this analysis, the University considers compatibility of this alternative with the relevant policies that were recommended in the RGF. This alternative would provide more housing than the proposed project, therefore the alternative would address the issues raised by the RGF policies to a greater extent than the proposed project does, and would therefore have less impact than the proposed project.

- Clean Air Plan. This alternative would conform to the Clean Air Plan (CAP) adopted by the Santa Barbara County Air Pollution Control District (SBCAPCD). This alternative would provide more housing than the proposed project, and would potentially reduce VMT, therefore this alternative would address the issues raised by the recommended CAP policies to a greater extent than the proposed project does, and would therefore have less impact than the proposed project.

- Central Coast Basin Plan. This alternative would conform to the Central Coast Basin Plan, adopted by the Central Coast RWQCB. The University has applied for NPDES Phase II permit and has prepared a SWMP, and would be obligated to follow all relevant regulations guiding construction and operation pertaining to the development of this alternative. Although more development would occur under this alternative, consistency with the Central Coast Basin Plan would be comparable to the proposed project.

- Airport Land Use Plan. This alternative is inconsistent with the Airport Land Use Plan. A portion of the site falls within the Approach Zone, and the proposed housing mix includes multi-family housing on the North Parcel which conflicts with the safety recommendation of the ALUP to avoid the concentration of people that multifamily housing would produce in an Approach Zone, however as the University is not subject to the ALUP provisions, this impact would be comparable to the proposed project.

Although this alternative would not be consistent with the land use guidelines of the ALUP, the proposed residential development would be compatible with the other safety-related guidelines for development in proximity to an airport. As noted above, the University is not subject to the requirements, and this alternative would not conflict with any safety regulations related to airport operations. Thus, as the University is not subject to the ALUP requirements, the inconsistency of multi-family residential dwellings in the Approach Zone would be a *less-than-significant* impact.

6.4.4.7 Agricultural Resources

As noted in Section 4.7 (Agricultural Resources), the Initial Study included in the Notice of Preparation for the proposed project, no portion of the project area under the University's jurisdiction is considered Prime Farmland, or Farmland of Statewide Importance. In addition, no portions of the site are zoned for agricultural use or are covered by a Williamson Act contract. Thus, *no impact* to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur under either the proposed project or any alternative to the project. No conflict with

agricultural zoning or a Williamson Act contract would occur. As no impacts to farmland would occur, an alternative to the proposed project would also not result in other changes to the environment that could result in the conversion of farmland to other non-agricultural use.

6.4.4.8 Mineral Resources

This alternative would not result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state (Impact 4.8-1). For the North and Storke-Whittier Parcels, no known economically recoverable mineral resources are located within the areas of proposed residential development. Historically, oil and gas operations have occurred in the South Parcel and open space areas under the University's jurisdiction; however, these operations are now conducted from an offshore location. Development in the South Parcel and open space areas and management of habitat would not interfere with existing oil recovery operations, which are conducted from an offshore location. This impact would be *less than significant*. Although a greater area would be subject to this development under this alternative, access to mineral resources in the project area, if any, would be comparable to the proposed project.

In addition, this alternative would not result in loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan (Impact 4.8-2). No mineral resource recovery sites are delineated in the General Plan for the County or the Goleta Community Plan (prepared by the County), which covers the project area. As noted above, residential development, open space improvements, and management of habitat areas would not interfere with existing oil recovery operations, which are conducted from an offshore location. This impact would be *less than significant*. Although a greater area would be subject to this development under this alternative, access to mineral resources in the project area, if any, would be comparable to the proposed project.

6.4.4.9 Visual Resources

Under this alternative, residential development within the project area would not have a substantial adverse effect on a scenic vista, similar to the proposed project (Impact 4.9-1). Development of 413 housing units on the North Parcel, South Parcel, and the Storke-Whittier Parcel would not block or eliminate scenic vistas. Depending on the precise location of the residential structures and the viewer, intermittent views of distant trees and undeveloped areas may be available, but most views across the North Parcel from these locations would be blocked. However, these views are on-campus views and do not constitute a scenic vista as defined in Section 4.9.2.3, and this impact would be *less than significant*. Although more residential development would occur, because no scenic vistas would be blocked, potential impacts would be comparable to the proposed project.

This alternative would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, therefore *no impact* would result (Impact 4.9-2). The UCSB North and West Campuses are located approximately

0.5 miles south of the SR-101 freeway, and generally bounded by Storke Road, Whittier Drive, Marymount Way, and Phelps Road, none of which are officially designated or identified as eligible for designation as a state scenic highway. Although more residential development would occur under this alternative, this impact would be comparable to the proposed project.

This alternative could substantially degrade the visual character or quality of the project area and the immediate surrounding area (Impact 4.9-3). Development of residential structures on the North, South, and Storke-Whittier Parcels would result in the conversion of undeveloped open space (on four separate parcels) into the site of residential development. Residential development on the South Parcel would occur in the midst of undeveloped and open space areas that are not adjacent to any other development. Thus, the change in the visual character of the South Parcel from undeveloped open space to the location of faculty housing would substantially degrade the visual character or quality of the area. Implementation of MM 4.9-3(a) through 4.9-3(h) would reduce, but not eliminate, the potentially adverse impacts related to the change in visual character. As no feasible mitigation measures are available to offset this impact, this impact would be *significant and unavoidable*. As residential development in previously undeveloped area would occur under this alternative, potential impacts would be greater than the proposed project.

This alternative could create new sources of substantial light or glare in the project area or vicinity that would adversely affect day or nighttime views from adjacent land uses (Impact 4.9-4). Development of residential structures on the North, South, and Storke-Whittier Parcels would introduce new sources of light and glare at these separate locations. With implementation of MM 4.9-4(a) (to require nonreflective, textured materials to minimize glare impacts) and MM 4.9-4(b) (to require new outdoor lighting on the North and West Campus to be kept at the minimum level this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than the proposed project.

6.4.4.10 Recreation

Under this alternative, residential development and open space improvements could increase recreational use of the open space area under UCSB jurisdiction, but would not result in the substantial physical deterioration of the open space areas (Impact 4.10-1). Consistent with LRDP policy 30221.1, the proposed residential developments would entail recreational and open space components for utilization by the new development, so as not to overburden existing recreational areas. Development of 413 housing units would increase the number of residential occupants of the project area, which could increase use of open space areas for passive recreation. Open space improvements could also result in more recreational users coming to the project area; however, these improvements (such as boardwalks over sensitive areas) would reduce potential effects associated with increased use. Passive recreational use of the COPR would be limited, per the Management Plan, and management actions implemented to reduce potential deterioration of open space areas from increased use. With implementation of MM 4.10-1(a) through MM 4.10-1(d) and University policies, this impact would be *less than significant.*

As more residential development and fewer open space improvements would occur under this alternative, potential impact would be greater than the proposed project.

This alternative would include recreational facilities associated with residential development and open area improvements that could facilitate passive recreational use; however, such development would not have an adverse physical effect on the environment (Impact 4.10-2). In conjunction with residential development, on-site recreational facilities such as a swimming pool, basketball courts, toddler/youth play areas, and community centers would be built. However, given the relatively small overall square footage of these facilities and improvements, they would not result in significant adverse physical effects on the environment. The construction and operation of recreational facilities could contribute to the effects on air, noise, biological resources, and other resource areas. The contribution of recreation and open area facilities and improvements to these resource impacts has been considered, as part of the alternative as a whole, in each of the relevant resource analysis sections for this alternative. With implementation of the identified mitigation measures identified for other environmental resources in this alternative analysis, implementation of the proposed recreational components of this alternative would not have an adverse physical effect on the environment, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than the proposed project.

This alternative would result in the loss of existing recreational opportunities (Impact 4.10-3). Residential development on the North and South Parcels would result in the loss of open space areas that are currently informally used for passive recreational activities. Residential development on the Storke-Whittier Parcels would result in the removal of the existing driving range for the Ocean Meadows Golf Course, although the golf course would not be otherwise affected by this alternative. Given the proximity of other public golf driving ranges, the loss of the existing driving range for the Ocean Meadows Golf Course would not result in significant adverse impacts. Total open space area available for passive recreation would be decreased due to development on the North, South, and Storke-Whittier parcels of the North Campus, and an island of development would be introduced in the midst of an open space area. Accordingly, even with implementation of MM 4.10-1(a) through MM 4.10-1(d) and University policies, this impact would be *significant and unavoidable*. As more residential development would occur (and more open space would be removed) under this alternative, potential impacts would be greater than the proposed project.

6.4.4.11 Cultural Resources

This alternative would not modify or demolish any existing structures as part of the project. Therefore, implementation of this alternative would not result in the modification or demolition of structures that have been designated as eligible or potentially eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) and *no impact* would result (Impact 4.11-1), comparable to the proposed project.

Construction activities associated with this alternative could result in damage to or the destruction of known and unknown archaeological resources (Impact 4.11-2). Residential development would result in disturbance of up to 67.1 acres of land (compared to approximately 43.3 acres for the proposed project). Open area improvements would be reduced in scope compared to the proposed project. Ground disturbance associated with residential and open space improvements could result in the disturbance or destruction of known and unknown archaeological resources. Under this alternative, the University would implement MM 4.11-2(a) through 4.11-2(h). With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative (and thus entail more acreage that is disturbed by construction activities), potential impacts would be greater than the proposed project.

Construction activities associated with implementation of the proposed alternative could result in damage to, or the destruction of, paleontological resources (Impact 4.11-3). As described in the previous impact, ground-disturbing activity would occur with residential development and open space improvements. Paleontological resources consisting of marine fossils have been found on the project site. However, such marine fossil resources are common in the County. If vertebrate fossils were found during construction activities, these would be considered rare and have the potential to answer important scientific questions, and the damage to or destruction of such resources would be considered a significant impact. With implementation of MM 4.11-2(d) and 4.11-2(e), this impact would be reduced to a *less-than-significant* level. As more area would be developed under this alternative, potential impacts would be greater than the proposed project.

Construction activities associated with implementation of this alternative could result in the disturbance of human remains (Impact 4.11-4). There are recorded archaeological sites in the project area, including one that has yielded human remains. Although no part of the project area has a recorded use as a human cemetery, the potential exists for human remains to be uncovered as a result of ground-disturbance activities. The University would implement MM 4.11-4 upon discovery of suspected human remains or a burial, to require an immediate halt of ground disturbance and notification of the County Coroner, and compliance with Public Resources Code Section 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As more area would be developed under this alternative, potential impacts would be greater than the proposed project.

6.4.4.12 Traffic and Circulation

Under this alternative, residential development and implementation of the COPR Management Plan would result in additional vehicular trips that would increase traffic volumes on the local street and highway network and degrade intersection levels of service (Impact 4.12-1). Residential development would include 147 units of faculty housing on the North Parcel, 122 units of faculty housing on the South Parcel and 144 units of family student housing on the Storke-Whittier Parcel. The increase of approximately 26 units of housing compared to the proposed project would generate additional vehicle trips, which could be partially offset by the

reduced scope of open area improvements, which may reduce the number of recreational users at the site. Overall, this alternative would result in a slight increase in vehicle trip generation compared to the proposed project. The University would implement MM 4.12-1(a) through 4.12-1(d). Even with implementation of these mitigation measures, the roadway impacts would be *significant and unavoidable* on Storke Road north of Hollister Avenue. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

Construction activities associated with implementation of this alternative would result in additional vehicular trips during construction that would increase traffic volumes on the local street and highway network and could degrade intersection levels of service (Impact 4.12-2). As residential development would occur on the North, South, and Storke-Whittier Parcels, construction trips could potentially affect more locations (assuming concurrent construction of all residential development). As typical construction hours are 7:00 am to 3:30 P.M., few, if any, construction-related trips would affect any intersections during the P.M. peak hour. Thus, construction trips resulting from either residential development or open area improvements would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than the proposed project.

Development of this alternative would result in additional vehicular trips that could exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (Impact 4.12-3). Residential development of 413 units would increase the residential population within the project area, and result in the generation of vehicle trips by the occupants of the new housing. Physical improvements associated with implementation of the COPR Management Plan could result in increased recreational use of the project area, which could result in additional vehicle trips. With implementation of MM 4.12-1(a) through 4.12-1(d), this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project, although still less than significant.

Development of this alternative would include new vehicular circulation elements, which would not result in hazards due to design features or incompatible land uses (Impact 4.12-4). It is anticipated that any new roadway segments that serve new residential development would employ the use of standard engineering practices (e.g., use of standard road and driveway widths, provision of adequate sight lines, and avoidance of sharp turning radii) and traffic mitigation strategies (e.g., installation of control devices such as stop signs or signal lights as needed) to avoid design elements that could result in hazards due to features such as sharp curves or dangerous intersections. Development of housing on the South Parcel is not anticipated to result in potential hazards associated with operation of the EMT, which only requires infrequent vehicular access. With use of standard engineering practices, this impact would be *less than significant*. As more residential development would occur, potential impacts would be greater than the proposed project.

Implementation of the alternative would increase traffic on local streets and modify pedestrian access routes, which could pose hazards to pedestrians (Impact 4.12-5). Residential development would increase vehicular circulation on local roadways, portions of which are not fully improved with sidewalks on both sides of the roadway. It is assumed that provision of vehicular access to the South Parcel would include sidewalks and/or pedestrian paths. This alternative would not result in pedestrian hazards due to design features or land use incompatibilities, and this impact would be *less than significant*. As more residential development would occur, potential impacts would be greater than for the proposed project.

Development of this alternative would result in construction activity that could require the short-term closure of traffic lanes or roadway segments, which could result in short-term traffic hazards (Impact 4.12-6). Construction on the North, South, and Storke-Whittier Parcels could impact adjacent streets during delivery of construction materials, installation or extension of utilities, or installation of street or pedestrian improvements. To reduce potential hazards associated with street closures, the University would implement MM 4.12-6, to require maintenance of a single traffic lane at all times, and signal carriers during such periods. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As more construction activity would occur under this alternative, potential impacts would be greater than for the proposed project.

Construction activities associated with implementation of this alternative could necessitate temporary closure of pedestrian sidewalks and paths or the provision of temporary pedestrian routes, which could result in short-term hazards to pedestrians during construction (Impact 4.12-7). The arrival or departure of construction vehicles and delivery of construction materials could intermittently disrupt pedestrian travel along pedestrian routes adjacent to construction sites. To reduce such possible hazards, MM 4.12-7 would require the provision of alternative pedestrian routes and assure such routes are accessible. With implementation of this mitigation, this impact would be reduced to a *less-than-significant* level. As more construction activity would occur under this alternative, potential impacts would be greater than for the proposed project.

Implementation of this alternative would result in additional vehicular trips that would increase traffic volumes on the local street and highway network and degrade intersection levels of service; however, any such degradation of levels of service would not impair access by emergency vehicles in the long-term (Impact 4.12-8). As discussed above in Impact 4.12-1, most intersections in the alternative vicinity would continue to operate at acceptable levels of service. In cases of traffic delays, emergency vehicles traverse congested roadways generally by requiring vehicles to move over to allow emergency vehicles to pass through. Thus, emergency vehicles are not anticipated to experience any substantial delays as a result of the significant and unavoidable traffic impacts that would occur and this impact would be *less than significant*. As more development would occur under this alternative, potential impacts would be greater than for the proposed project.

Under this alternative, construction vehicle trips and short-term roadway closures could impede emergency access. (Impact 4.12-9) As discussed above under Impact 4.12-2, simultaneous

construction of faculty and family student housing and open space improvements would generate construction-related vehicle trips; however, any short-term increases in traffic would not substantially increase traffic volumes on any roadways in the project vicinity. The University would implement MM 4.12-9, to require notification of emergency service providers in the event of any project-related street closures. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As more construction activity would occur under this alternative, potential impacts would be greater than for the proposed project.

Implementation of this alternative would not result in inadequate parking capacity (Impact 4.12-10). Based on a ratio of approximately 2.19 spaces per unit of housing, 589 spaces would be provided for 269 units of faculty housing and 315 spaces provided for 144 units of family student housing. This supply of parking would adequately meet parking demand associated with residential occupants and their visitors. As there would be no additional public parking added in this alternative, but correspondingly there would be fewer open space improvements, public parking would not be inadequate, as access would still be provided in other on-campus parking lots. This impact would be *less than significant*. Although more residential development would occur under this alternative, potential impacts would be comparable with the proposed project, as parking would be provided to meet demand for the additional units of housing.

Construction activities associated with proposed alternative implementation would require short-term parking for construction workers (Impact 4.12-11). During construction of the residential structures, construction workers could be present on the three residential development sites and the areas with open space improvements. With the ample acreage on each parcel, it is anticipated that sufficient area would be available to provide on-site parking for construction, or in nearby areas. Thus, this alternative would not result in inadequate parking capacity during construction, and this impact would be *less than significant*. As more construction activity would occur under this alternative, potential impacts would be greater than for the proposed project.

Development of the alternative would not conflict with applicable policies, plans, or programs supporting alternative transportation (Impact 4.12-12). The development of both faculty housing and student housing in a location close to campus would facilitate the use of alternative modes of travel to the campus, including bicycle commuting on adjacent Class II bike lanes, or taking mass transit from adjacent or proximal bus stops. This impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be less than the proposed project, because more residents would be located closer to campus and thus able to utilize alternative transportation modes.

Development of this alternative could increase the on-site residential population and increase recreational use of Open Space areas, which could contribute to increased demand for public transit (Impact 4.12-13). As discussed in the Section 4.12 (Traffic and Circulation), adequate transit facilities serve the site, and while the increase in the local population would increase demands for public transit, existing transit facilities could adequately serve demands from proposed development. This impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than the

proposed project, because more residents would be located closer to campus and thus able to utilize public transit.

6.4.4.13 Noise

Under this alternative, development of 413 housing units on approximately 67.1 acres of land and open space improvements within the project area could increase ambient noise levels, but would not expose occupants of new on-campus residential development to noise levels in excess of the State's 45 dBA CNEL interior noise standard (Impact 4.13-1). Development of faculty and family student housing would increase vehicular trips in the project vicinity, introduce new sources of stationary noise, and result in the exposure of residential occupants to increased ambient noise levels. Implementation of open space improvements could increase recreational use of Open Space areas, which would contribute to increases in vehicular traffic noise and intermittent noise from recreational use of the Open Space areas. In addition, residential development on the North Campus would be exposed to intermittent noise from aircraft operations from the Santa Barbara Municipal Airport. Given existing and projected ambient noise levels, and the anticipated exterior-to-interior noise reduction of 30 dBA or more in new residential buildings, interior noise levels within new residential buildings would not exceed 45 dBA CNEL, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

Construction activities associated with implementation of this alternative could generate and expose persons to excessive groundborne vibration or groundborne noise levels (Impact 4.13-2). Construction activities would primarily impact the existing residences located adjacent to the north campus housing sites (e.g., the existing West Campus Family Student Housing), with vibration levels possibly reaching up to 81 VdB at the properties located in close proximity the project sites. This would exceed the 80 VdB threshold for residences and buildings where people normally sleep. Therefore, this impact would be potentially significant if it occurs during the hours when most people sleep. With implementation of MM 4.13-2, limiting hours of construction, this impact would be reduced to a *less-than-significant* level. As more residential development would occur under the alternative, potential impacts would be greater than for the proposed project.

Operational impacts of this alternative would not generate and expose persons to excessive groundborne vibration or groundborne noise levels (Impact 4.13-3). If this alternative were completed and operational, background vibration levels associated with heating, ventilation, and air conditioning (HVAC) systems equipment in residential buildings would be expected to average around 50 VdB, substantially less than the 80 VdB threshold for residential buildings. Therefore, this impact would be *less than significant*. Although more residential development would occur under this alternative, vibration levels associated with HVAC equipment would be similar to the proposed project. Thus, potential impacts would be comparable to the proposed project.

Operation of this alternative would generate increased local traffic volumes, but would not cause a substantial permanent increase in noise levels above existing noise levels (Impact 4.13-4). Development of 269 units of faculty housing on the North and South Parcels and 144 units of family student housing on the Storke-Whittier Parcels would result in the generation of additional vehicular trips that would increase ambient noise levels in the project vicinity. This increase in traffic in the local vicinity would slightly increase ambient noise levels. This impact would be *less than significant*. As more residential development would occur under the alternative, potential impacts would be greater than for the proposed project.

Operation of this alternative could add new stationary sources of noise, but would not cause a substantial permanent increase in ambient noise levels (Impact 4.13-5). Development of faculty and family student housing would introduce new sources of stationary noise (e.g., HVAC systems). Residential HVAC systems typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. Given existing ambient noise levels, installation of HVAC systems in new residential buildings would not cause a substantial increase in existing noise levels by 5 dBA CNEL or more. This impact would be *less than significant*. As more residential development would occur under the alternative, potential impacts would be greater than for the proposed project.

Development of this alternative could result in substantial temporary or periodic increases in ambient noise levels (Impact 4.13-6). Construction of faculty and family student housing would result in the temporary or periodic increases in ambient noise levels associated with typical construction activities, including clearance and grading of sites and framing of structures. The University would implement MM 4.13-6(a), to restrict construction hours, MM 4.13-6(b), to place stationery construction equipment as far away from sensitive receptors as possible and shield where necessary, and MM 4.13-6(c), to require on-site signage listing construction hours and contact information for complaints regarding noise. These measures would not, however, ensure that construction noise levels would not result in a temporary or periodic increase by more than 10 dBA at noise sensitive uses located in close proximity to the construction sites, therefore, this impact would be *significant and unavoidable*. As more residential development would occur under the alternative, potential impacts would be greater than for the proposed project.

Development of the alternative would increase the residential population of the project area, but would not expose people residing or working in the project area to excessive noise levels associated with aircraft operations (Impact 4.13-7). All portions of the North and West Campuses are located outside of the limits of the 60 dBA CNEL contour for Santa Barbara Airport. Thus, occupants of the new residential structures would not be exposed to excessive noise levels associated with aircraft operations, and this impact would be *less than significant*. Although more residential development would occur under the alternative, noise levels from aircraft operations would be similar, and potential impacts would be comparable with the proposed project.

Similar to the proposed project, the project area is not located within the vicinity of a private airstrip, and *no impact* would result from this alternative (Impact 4.13-8).

6.4.4.14 Air Quality

Implementation of the alternative would result in the emission of additional criteria air pollutants, but would not conflict with or obstruct implementation of the Air Quality Management Plan (Impact 4.14-1). Development of 413 housing units on approximately 67.1 acres of land and open space improvements within the project area would increase the amount of occupied building space on the North Campus, increase vehicular trips in the project vicinity and increase operational emissions due to building mechanical equipment. While this alternative proposes more housing on the project site than was originally built into the assumptions, it also provides an opportunity to reduce VMT to a potentially greater degree than the proposed project (as more faculty and students would reside in close proximity to the main campus), which could reduce emissions. Thus, this alternative would not impair implementation of the Clean Air Plan, and this impact would be *less than significant*. However, despite potential reduction in VMT described above, as more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

Construction activities would result in the generation of criteria pollutants, which would not contribute substantially to an existing or projected air quality violation (Impact 4.14-2). During construction, three basic types of activities would generate emissions: grading as part of site preparation, physical construction, and landscaping. Although more residential units would be constructed, based on modeling performed for the proposed project as analyzed in Section 4.14 (Air Quality), construction-related annual emissions for this alternative would not exceed SBCAPCD significance thresholds during the construction phases of development. Therefore, this impact would be *less than significant*. To further reduce any impact, and to be in compliance with Air Pollution Control District recommendations, MM 4.14-2 requires that a range of dust control measures be implemented, to the extent feasible, during construction. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

This alternative would generate operational emissions from motor vehicles that exceed SBCAPCD thresholds (Impact 4.14-3). Development of 413 residential units would increase vehicular trips in the project vicinity and increase operational emissions due to building mechanical equipment. Because the daily mobile emissions generated by motor vehicles would exceed the thresholds recommended by the SBCAPCD, and this impact would be *significant and unavoidable*. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

Implementation of this alternative would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (Impact 4.14-4). Construction-related or operational emissions that exceed the thresholds of significance for an individual project would also cause a cumulatively considerable net increase in pollutants in Santa Barbara County. While construction-related annual emissions would not exceed SBCAPCD significance thresholds, the emissions generated by motor vehicles would exceed the thresholds recommended for this

source. Because the daily emissions associated with these trips would exceed the thresholds recommended by the SBCAPCD, this alternative would cause a cumulatively considerable net increase in emissions that are the precursors to ozone. Even with implementation of MM 4.14-3, mobile source emissions from vehicles would not be reduced below applicable thresholds, and this impact would be *significant and unavoidable*. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

Implementation of this alternative would not expose sensitive receptors to substantial pollutant concentrations of CO (Impact 4.14-5). This impact would be *less than significant*.

Implementation of this alternative would not expose sensitive receptors to substantial pollutant concentrations of toxic air emissions (Impact 4.14-6). Toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the project site. Only small quantities of common forms of hazardous or toxic substances, such as cleaning agents, which are typically used or stored in conjunction with residential uses, would be present. Most uses of such substances would occur indoors. Based on the common uses expected on the site, any emission would be minor, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

Implementation of this alternative would not create objectionable odors affecting a substantial number of people (Impact 4.14-7). Construction activities occurring in association with the proposed alternative would generate such airborne odors as diesel exhaust and paints or other architectural coatings. These emissions would occur during daytime hours only and would be isolated to the immediate vicinity of the construction site and activity, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than for the proposed project.

6.4.4.15 Public Services

Development under this alternative could increase the demand for fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable response times, fire flows, and service ratios (Impact 4.15-1). The University would implement MM 4.15-1, to require that new residential buildings have fire alarm connections with the University Police Command Center to facilitate emergency response. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than the proposed project.

Development under this alternative could increase the demand for police protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable response times and service ratios (Impact 4.15-2). The University would implement MM 4.15-2(a), to require annual assessment of police staffing and equipment levels to assure appropriate service levels, MM 4.15-2(b), to require annual

meetings with the Director of Housing, the UCPD, and the Santa Barbara County Sheriff Department to evaluate the adequacy of police protection services, and MM 4.15-2(c), to require lighting associated with the proposed developments to meet minimum standards for safety. With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than the proposed project.

Development under this alternative would increase enrollment in local schools (Impact 4.15-3). Under this alternative, 413 residential units would be developed that would contribute school-aged children to the local school system. Based on the projected increase in housing (compared to the proposed project), this alternative would result in an increase in enrollment of approximately 117 students at all three school levels, which would increase enrollment demands on the Goleta Union School District and the Santa Barbara High School District. The additional students generated by this alternative would not result in overcapacity issues within the SBHSD or GUSD schools serving the site, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would result in residential development that would generate additional demand for domestic water; however, this alternative would not require the construction of new or expanded water treatment facilities (Impact 4.15-4). In addition, implementation of MM 4.15-4 would require that the campus maintain and ensure provision of adequate water treatment facilities, water mains, and reclaimed water distribution systems in order to meet campus needs. Development of 413 residential units would increase water demand; however, the resulting increase in discharge would not exceed the ability of the Goleta Water District to provide water to the project area, or require new water treatment facilities, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would result in an increased amount of impervious surfaces; however, this alternative would not require the construction of new storm water drainage facilities (Impact 4.15-5). This alternative would include modifications to Phelps Ditch and installation of a culvert on Devereux Creek. No other modifications to drainage facilities are proposed, with the exception of minor extension of existing drainage culverts or surface channels, which would accommodate runoff from some locations of project development. Modification to Phelps Ditch, installation of a culvert on Devereux Creek, or other minor extensions of existing storm drain facilities would contribute to potentially significant impacts related to construction noise. Implementation of MM 4.13-2, to limit hours of construction, MM 4.13-6(a), to require that stationary construction equipment be located away from residential areas, and MM 4.13-6(b), require signage with contact information for construction noise complaints, would reduce potential construction effects associated with expansion of storm drain facilities. Given the distance of the culvert to residential areas, the limited extent of improvement and the proposed mitigation measures, noise impacts associated with storm drain facility improvements would be reduced to a less-than-significant level. Although more

residential development would occur, because drainage modifications would be similar to the proposed project, potential impacts would be comparable to the proposed project.

Development under this alternative would increase demand for water, but would not require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements (Impact 4.15-6). Development of 413 residential units would increase demand for domestic water. With a 200 AFY water entitlement surplus, implementation of this alternative would not require new or expanded water entitlements and resources. However, to reduce water usage, the University would implement MM 4.15-6(a) through 4.15-6(d) to implement a range of water conservation measures, and this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would generate solid waste that would not require the expansion of the permitted capacity of a regional landfill (Impact 4.15-7). Development of 413 residential units would result in the generation of solid waste that would contribute to use of the remaining capacity of the Tajiguas Landfill. With an estimated remaining 17-year life at the Tajiguas Landfill, the landfill would adequately serve the solid waste generated by this alternative. The University would implement MM 4.15-7, to include residential development and open space areas in the campus' existing solid waste reduction and recycling program, and this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would comply with all applicable federal, State, and local statutes and regulations related to solid waste (Impact 4.15-8). As discussed above, MM 4.15-7 would require the University to continue to include residential development and open space areas in ongoing solid waste reduction and recycling programs. This would ensure compliance with State-mandated solid waste reduction efforts. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would not exceed wastewater treatment requirements of the RWQCB (Impact 4.15-9). Residential development would result in the generation of wastewater, which would be discharged into the GWSD wastewater collector system and be treated at the GWSD Wastewater Treatment Plant. The University would comply with applicable requirements established by the Central Coast RWQCB, and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would not require the construction of new or expanded wastewater conveyance systems (e.g., trunk lines) (Impact 4.15-10). Residential development would result in the generation of wastewater, which would be discharged into the GWSD wastewater collector system, for which repairs and/or upgrades to the local trunk lines are

planned. With implementation of MM 4.15-4, the campus would continue to maintain and ensure provision of adequate wastewater conveyance systems and treatment facilities in order to meet campus needs for faculty and student housing developments. The University would also implement MM 4.15-6(a) through 4.15-6(d) to put into practice a range of water conservation measures, which would also reduce wastewater generation, and this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would not increase wastewater generation such that treatment facilities would be inadequate to serve the project's projected demand in addition to the provider's existing commitments (Impact 4.15-11). Residential development would result in the generation of wastewater, which would be discharged into the GWSD wastewater collector system and be treated at the GWSD Wastewater Treatment Plant, which has sufficient capacity to accommodate the increased wastewater discharge. With implementation of MM 4.15-4, the campus would continue to maintain and ensure provision of adequate wastewater conveyance systems and treatment facilities in order to meet campus needs for faculty and student housing developments. The University would also implement MM 4.15-11, to require consultation with GWSD, and, if necessary, fashion an agreement for use of GWSD capacity, and MM 4.15-6(a) through 4.15-6(d) to implement a range of water conservation measures, which would also reduce wastewater generation. Thus, this impact would be reduced to a *less-than-significant* level. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would result in residential development that would increase the demand for electricity and natural gas; however, this alternative would not require or result in the construction of new energy production or transmission facilities nor result in the inefficient use of energy (Impacts 4.15-12, 4.15-13, and 4.15-14). Under this alternative, 26 more housing units that would require electricity and natural gas supplies would be constructed than under the proposed project. This alternative would comply with the conservation requirements of Title 24 of the California Code of Regulations and the recently enacted UC Green Building Policy and Clean Energy Standard, which requires energy conservation measures to exceed Title 24 standards by 20 percent. Thus, this alternative would not require or result in the construction of new energy production or transmission facilities or the inefficient use of energy, and these impacts would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than under the proposed project.

6.4.4.16 Population and Housing

Development under this alternative would not induce substantial population growth in the area by providing additional housing or indirectly by improving open space (Impact 4.16-1). Development of 413 housing units on approximately 67.1 acres of land and implementation of the COPR Management Plan within the project area would increase the residential population of the project area and increase recreational use of open space. An increase in housing of 413 units, representing a potential increase of 1,069 residents under this alternative would not represent a

substantial increase in population growth in the area relative to the overall population. Residential development would not result in a substantial increase in housing supply, and, therefore, would not induce substantial population growth in the area, relative to the overall population of the area. The increase in residential occupants of the area and recreational visitors to open space areas could increase demand for retail goods and services from commercial establishments in the vicinity of this alternative area. Increased demand for retail goods and services could indirectly induce population growth in the area; however, given the relatively minor increase in on-site residential population (in relation to area population), this alternative would not indirectly induce substantial population. This impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than the proposed project.

6.4.4.17 Relationship to Project Objectives

The Existing LRDP Alternative would meet the following the project objectives:

- Provide a variety of additional University-owned faculty housing to meet long-term demand for affordable faculty housing and thereby enable the University to recruit and retain a superior quality of and diverse faculty.
- Provide additional University-owned family-student housing to meet demand for affordable family student housing, and enable the retention of a broad selection of qualified students.
- Provide on-campus housing to support closer linkages between residential and academic functions and reduce the number and length of vehicle trips associated with commuting.
- Create attractive new residential neighborhoods for faculty and their families and student families that are compatible with existing adjacent residential uses.
- Integrate the proposed family-student housing with the existing West Campus Family Student Apartments Family Student Housing to enhance the existing facilities and create a shared sense of community.
- Provide a mix of townhome, duplex, studio, and detached single-family homes for faculty, to respond to demand for varied housing types.
- Maximize the ability of the North Campus to meet identified campus housing needs.
- Implement restoration opportunities and physical improvements identified in the Coal Oil Point Natural Reserve Management Plan.

This alternative would not or would only partially meet the following the project objectives:

- Develop much-needed housing in such a manner as to preserve and protect the natural setting of the Coal Oil Point Reserve and other sensitive coastal resources.
- Implement proposed project components of the Joint Proposal and Open Space Plan within the University's jurisdiction and thereby provide an open space, habitat, and development

plan that is, on balance, most protective overall of sensitive natural and coastal resources and assures improved public coastal access and the preservation and enhancement of 652 contiguous acres of open space, natural reserve, and marine environment resources.

- Protect, enhance, and restore key natural, cultural, and scenic resources using an integrated ecosystems approach.
- Provide for improved public access and compatible passive recreation, consistent with the conservation of significant coastal resources.
- Protect Devereux Creek, Devereux Slough and the adjacent upland and marine habitats.
- Preserve and protect and restore identified sensitive habitat areas, including wetland, native grassland, dune, back dune, and freshwater pond habitat.
- Provide residential and open space land uses that are consistent, to the extent feasible, with the California Coastal Act policies, and with the prior development plans and expectations for the West Devereux property (now the University's North Campus) that was set forth for this area through standards in the Santa Barbara County Local Coastal Plan.

6.4.5 Alternative 4: Maximum Housing

6.4.5.1 Description

Under this alternative, the number of housing units would be maximized to assist the University in meeting long-term housing needs. 237 units of faculty housing would be developed on the North Parcel, 207 units of faculty housing would be developed on the South Parcel, and 151 units of Family Student Housing would be developed on the Storke-Whittier site, for a total of 595 units (compared to 387 for the proposed project). Development would occur on approximately 23 acres of the North Parcel, approximately 40 acres on the South Parcel, and approximately 13 acres of the Storke-Whittier Parcel (including the lawn area east of the existing West Campus Family Student Housing complex), for a total of approximately 76 acres. Under this alternative, no open space improvements would occur, except as provided for in the COPR management plan.

As this alternative would result in development of housing at three locations (the North Parcel, the South Parcel, and the Storke-Whittier Parcel), the impacts of this alternative would be similar to those of Alternative 3 (Existing LRDP), although more units would be developed (595 for Alternative 4 compared to 416 for Alternative 3) and a larger land area would be subject to development (76 acres for Alternative 4 compared to 67.1 acres for Alternative 3).

6.4.5.2 Geology and Geologic Hazards

Under this alternative, development of 595 housing units on approximately 76 acres could: expose people and/or structures to potentially adverse effects related to seismic ground shaking (Impact 4.2-1); result in substantial soil erosion and the loss of topsoil (Impact 4.2-2); occur on

soils of varying soil and slope stability (Impact 4.2-3); occur in areas underlain with expansive soils (Impact 4.2-4). With implementation of relevant mitigation measures related to geology and geologic hazards, these impacts would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, and a greater number of residential units would be developed, potential geology and geological hazard impacts would be greater than the proposed project.

6.4.5.3 Hydrology and Water Quality

Under this alternative, development of residential structures on approximately 76 acres and implementation of the COPR Management Plan would not: violate existing water quality standards or waste discharge requirements (Impact 4.3-1); substantially deplete groundwater supplies or interfere substantially with groundwater recharge (Impact 4.3-2); substantially alter site drainage patterns and result in substantial erosion or siltation on or off site (Impact 4.3-3); substantially alter site drainage patterns or substantially increase the rate or amount of surface runoff and thus result in flooding either on or off site (Impact 4.3-4); create runoff that would exceed the capacity of existing storm drain systems or provide substantial sources of polluted runoff (Impact 4.3-5). Under this alternative, residential development and implementation of the COPR Management Plan would require the construction of new stormwater drainage systems; however, these new or expanded facilities would not result in significant impacts (Impact 4.3-6). This alternative would not: otherwise substantially degrade water quality (Impact 4.3-7); place housing within a 100-year flood hazard area (Impact 4.3-8); result in development within a 100-year flood hazard area that could impede or redirect flood flows (Impact 4.3-9); expose people or structures to significant risk of loss, injury, or death involving flooding (Impact 4.3-10); or expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow (Impact 4.3-11). With implementation of relevant mitigation measures related to hydrology and water quality, these impacts would be reduced to a *less than significant* level. As development would occur over a larger area, potential hydrology and water quality impacts would be greater than the proposed project.

6.4.5.4 Biological Resources

Under this alternative, residential development and open space improvements would: result in adverse impacts to candidate, sensitive, or special status plant and wildlife species (Impact 4.4-1); substantial adverse effects on sensitive natural communities (Impact 4.4-2); result in substantial adverse effects on federally protected wetlands through direct removal, placement of fill, or hydrological interruption (Impact 4.4-3); or interfere with the movement of native resident or migratory wildlife species, including migratory birds and raptors (Impact 4.4-4). This alternative, would be in substantial conformance with local applicable policies protecting biological resources (Impact 4.4-5), and would not conflict with the provisions of an applicable habitat conservation plan (Impact 4.4-6). With implementation of relevant mitigation measures related to biological resources, these impacts would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, and less open space would be preserved

and restored, potential impacts to biological resources would be greater than the proposed project.

6.4.5.5 Hazards and Hazardous Materials

Under this alternative, development of 595 housing units could: expose campus occupants or the public to significant hazards due to the routine transport, use, disposal, or storage of hazardous materials (Impact 4.5-1); expose workers to health and safety risks through earthmoving activities in areas with potentially contaminated soils or groundwater (Impact 4.5-2); expose construction workers, occupants of new residential structures and recreational users of open space to the naturally occurring hazards of Radon-222, natural gas and oil seeps (Impact 4.5-3); expose construction workers and the public to potential health risks associated with abandoned oil wells (Impact 4.5-4); expose the public to potential health risks in the event of the accidental discovery of an abandoned oil well (Impact 4.5-5); or expose the public to potential health risks in the event of an accident or accidental release from the EMT (Impact 4.5-6). This alternative would not result in construction on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Impact 4.5-7) or result in a significant safety hazard for people residing or working in the project area associated with proximity to the Santa Barbara Municipal Airport (Impact 4.5-8). This alternative could impair implementation of, or physically interfere with, an adopted emergency response plan (Impact 4.5-9); and expose people or structures to a risk of loss, injury, or death involving wildland fires (Impact 4.5-10). With implementation the identified mitigation measures related to hazards and hazardous materials, these impacts would be reduced to a *less-than-significant* level. As residential development would occur over a larger area, and residential development would occur on the South Parcel, potential impacts from hazards and hazardous materials would be greater than the proposed project.

6.4.5.6 Land Use

This alternative would be largely consistent with applicable land use plans, policies, and regulations (Impact 4.6-1). This alternative would result in inconsistencies with the Coastal Act including Sections 30233 and 30255 related to filling of wetlands, and Section 30251 related to protection of visual resources, as well as Coastal Act policies relating to the protection of recreational resources. It would be largely consistent with the development standards in the Local Coastal Plan portion of the Goleta Community Plan; consistent with the relevant recommended policies regarding the county's jobs-housing balance as presented in the Santa Barbara County Association of Governments, Regional Growth Forecast 2000; conform to the Clean Air Plan (CAP) adopted by the Santa Barbara County Air Pollution Control District (SBCAPCD), and conform to the Central Coast Basin Plan, adopted by the Central Coast RWQCB. This alternative would be inconsistent with the Airport Land Use Plan, however as the University is not subject to the ALUP provisions, and this impact would be *less than significant*. As this alternative would result in more residential development, introduce an island of development into an existing undeveloped area and preserve less open space, potential land use impacts would be greater than the proposed project.

6.4.5.7 Agricultural Resources

No portion of the project area under the University's jurisdiction is considered Prime Farmland, or Farmland of Statewide Importance. In addition, no portions of the site are zoned for agricultural use or are covered by a Williamson Act contract. Thus, *no impact* would occur and impacts would be comparable to the proposed project.

6.4.5.8 Mineral Resources

This alternative would not result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state (Impact 4.8-1), or result in loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan (Impact 4.8-2). These impacts would be *less than significant*. Although a greater area would be subject to this development under this alternative, access to mineral resources in the project area, if any, would be comparable to the proposed project.

6.4.5.9 Visual Resources

Under this alternative, residential development within the project area would not have a substantial adverse effect on a scenic vista (Impact 4.9-1), or substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (Impact 4.9-2). This alternative could substantially degrade the visual character or quality of the project area and the immediate surrounding area due to residential development on the South Parcel which would introduce an island of development into an undeveloped area (Impact 4.9-3), and this impact would be *significant and unavoidable*. This alternative could create new sources of substantial light or glare in the project area or vicinity that would adversely affect day or nighttime views from adjacent land uses (Impact 4.9-4), however implementation of relevant mitigation measures related to visual quality, this impact would be reduced to a less than-significant level. However, as a significant and unavoidable impact related to degradation of visual quality would result, visual quality impacts would be greater than the proposed project.

6.4.5.10 Recreation

Under this alternative, residential development and open space improvements could increase recreational use of the open space area under UCSB jurisdiction, but would not result in the substantial physical deterioration of the open space areas (Impact 4.10-1) and include recreational facilities that could facilitate passive recreational use; however, such development would not have an adverse physical effect on the environment (Impact 4.10-2), and these impacts would be *less than significant*. This alternative would result in the loss of existing and future recreational opportunities (Impact 4.10-3). Residential development on the North and South Parcels would result in the loss of open space areas that are currently informally used for passive recreational activities. Development of the South Parcel would fragment existing open

space areas. In addition, this alternative would not contribute to the preservation of 652 acres of consolidated open space. Even with implementation of MM 4.10-1(a) through MM 4.10-1(d), this impact would be *significant and unavoidable*. As more residential development would occur (and more open space would be removed) under this alternative, potential recreation impacts would be greater than the proposed project.

6.4.5.11 Cultural Resources

This alternative would not result in the modification or demolition of structures that have been designated as eligible or potentially eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR), and *no impact* would result (Impact 4.11-1). This alternative could result in damage to or the destruction of known and unknown archaeological resources (Impact 4.11-2); result in damage to, or the destruction of, paleontological resources (Impact 4.11-3); or result in the disturbance of human remains (Impact 4.11-4). With implementation of relevant mitigation measure related to cultural resources, these impacts would be reduced to a *less-than-significant* level. As more area would be developed under this alternative, potential impacts to cultural resources would be greater than the proposed project.

6.4.5.12 Traffic and Circulation

Under this alternative, residential development and open space improvements would result in additional vehicular trips that would increase traffic volumes on the local street and highway network and degrade intersection levels of service (Impact 4.12-1). Even with implementation of the identified mitigation measures, roadway impacts would remain *significant and unavoidable* on Storke Road north of Hollister Avenue. Construction activities would not degrade intersection levels of service (Impact 4.12-2). This alternative would not: result in additional vehicular trips that could exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (Impact 4.12-3); result in hazards due to design features or incompatible land uses (Impact 4.12-4); or increase traffic on local streets and modify pedestrian access routes, which could pose hazards to pedestrians (Impact 4.12-5). Construction activity could: require the short-term closure of traffic lanes or roadway segments, which could result in short-term traffic hazards (Impact 4.12-6), necessitate temporary closure of pedestrian sidewalks and paths or the provision of temporary pedestrian routes, which could result in short-term hazards to pedestrians during construction (Impact 4.12-7). This alternative would not impair access by emergency vehicles in the long-term (Impact 4.12-8), but could impair access during the construction (Impact 4.12-9). This alternative would not result in inadequate parking capacity (Impact 4.12-10), but would require short-term parking for construction workers (Impact 4.12-11). This alternative would not conflict with applicable policies, plans or programs supporting alternative transportation (Impact 4.12-12), but would contribute to increased demand for public transit (Impact 4.12-13). With implementation of the identified mitigation measures, impacts to traffic and transportation would be reduced to a less-than-significant level, except for the roadway impact identified above, which would remain *significant and unavoidable*. As more residential development would occur

under this alternative, potential traffic and transportation impacts would be greater than the proposed project.

6.4.5.13 Noise

Under this alternative, development of 595 housing units on approximately 76 acres of land and open space improvements within the project area could increase ambient noise levels, but would not expose occupants of new on-campus residential development to noise levels in excess of the State's 45 dBA CNEL interior noise standard (Impact 4.13-1). Construction activities associated with implementation of this alternative could generate and expose persons to excessive groundborne vibration or groundborne noise levels (Impact 4.13-2). Operational impacts of the alternative would not generate and expose persons to excessive groundborne vibration or groundborne noise levels (Impact 4.13-3). Operation of this alternative would generate increased local traffic volumes, but would not cause a substantial permanent increase in noise levels above existing noise levels (Impact 4.13-4). Operation of this alternative could add new stationary sources of noise, but would not cause a substantial permanent increase in ambient noise levels (Impact 4.13-5). Construction of this alternative could result in substantial temporary or periodic increases in ambient noise levels (Impact 4.13-6), and even with implementation of the identified mitigation measures, this impact would be *significant and unavoidable*. Development of this alternative would increase the residential population of the project area, but would not expose people residing or working in the project area to excessive noise levels associated with aircraft operations (Impact 4.13-7). This alternative is not located within the vicinity of a private airstrip, and *no impact* would result (Impact 4.13-8). With implementation of the identified mitigation measures, noise impacts would be reduced to a less-than-significant level, except for the construction noise impacts, which would be *significant and unavoidable*. As more residential development would occur under the alternative, potential impacts would be greater than for the proposed project.

6.4.5.14 Air Quality

Implementation of the alternative would result in the emission of additional criteria air pollutants, but would not conflict with or obstruct implementation of the Air Quality Management Plan (Impact 4.14-1). Construction activities would result in the generation of criteria pollutants, which would not contribute substantially to an existing or projected air quality violation (Impact 4.14-2). This alternative would generate operational emissions from motor vehicles that exceed SBCAPCD thresholds (Impact 4.14-3) and would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (Impact 4.14-4) and these impacts would be *significant and unavoidable*. Implementation of this alternative would not: expose sensitive receptors to substantial pollutant concentrations of CO (Impact 4.14-5); expose sensitive receptors to substantial pollutant concentrations of toxic air emissions (Impact 4.14-6); or create objectionable odors affecting a substantial number of people (Impact 4.14-7). Even with implementation of the identified mitigation measures, air quality impacts would remain

significant and unavoidable. As development would occur over a larger area and more residential units would be developed, potential impacts would be greater than the proposed project.

6.4.5.15 Public Services

Development under this alternative could increase the demand for fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable response times, fire flows, and service ratios (Impact 4.15-1). This alternative could increase the demand for police protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable response times and service ratios (Impact 4.15-2). Development under this alternative would increase enrollment in local schools (Impact 4.15-3); and generate additional demand for domestic water; however, this alternative would not require the construction of new or expanded water treatment facilities (Impacts 4.15-4). Development under this alternative would result in an increased amount of impervious surfaces; however, this alternative would not require the construction of new storm water drainage facilities (Impact 4.15-5). This alternative would increase demand for water, but would not require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements (Impact 4.15-6). This alternative would generate solid waste that would not require the expansion of the permitted capacity of a regional landfill (Impact 4.15-7). Development would comply with all applicable federal, State, and local statutes and regulations related to solid waste (Impact 4.15-8); would not exceed wastewater treatment requirements of the RWQCB (Impact 4.15-9); would not require the construction of new or expanded wastewater conveyance systems (e.g., trunk lines) (Impact 4.15-10); or increase wastewater generation such that treatment facilities would be inadequate to serve the project's projected demand in addition to the provider's existing commitments (Impact 4.15-11). Development under this alternative would result in residential development that would increase the demand for electricity and natural gas; however, this alternative would not require or result in the construction of new energy production or transmission facilities nor result in the inefficient use of energy (Impacts 4.15-12, 4.15-13, and 4.15-14). With implementation of the identified mitigation measures, impacts would be reduced to a *less-than-significant* level. As more residential development would occur, potential public service impacts would be greater than the proposed project.

6.4.5.16 Population and Housing

Development under this alternative would not induce substantial population growth in the area by providing additional housing or indirectly by improving open space (Impact 4.16-1) and this impact would be *less than significant*. As more residential development would occur under this alternative, potential impacts would be greater than the proposed project.

6.4.5.17 Relationship to Project Objectives

The Maximum Housing Alternative would meet the following the project objectives:

- Provide a variety of additional University-owned faculty housing to meet long-term demand for affordable faculty housing and thereby enable the University to recruit and retain a superior quality of and diverse faculty.
- Provide additional University-owned family-student housing to meet demand for affordable family student housing, and enable the retention of a broad selection of qualified students.
- Provide on-campus housing to support closer linkages between residential and academic functions and reduce the number and length of vehicle trips associated with commuting.
- Create attractive new residential neighborhoods for faculty and their families and student families that are compatible with existing adjacent residential uses.
- Integrate the proposed family-student housing with the existing West Campus Family Student Apartments Family Student Housing to enhance the existing facilities and create a shared sense of community.
- Provide a mix of townhome, duplex, studio, and detached single-family homes for faculty, to respond to demand for varied housing types.
- Maximize the ability of the North Campus to meet identified campus housing needs.
- Implement restoration opportunities and physical improvements identified in the Coal Oil Point Natural Reserve Management Plan.

This alternative would not or would only partially meet the following the project objectives:

- Develop much-needed housing in such a manner as to preserve and protect the natural setting of the Coal Oil Point Reserve and other sensitive coastal resources.
- Implement proposed project components of the Joint Proposal and Open Space Plan within the University's jurisdiction and thereby provide an open space, habitat, and development plan that is, on balance, most protective overall of sensitive natural and coastal resources and assures improved public coastal access and the preservation and enhancement of 652 contiguous acres of open space, natural reserve, and marine environment resources.
- Protect, enhance, and restore key natural, cultural, and scenic resources using an integrated ecosystems approach.
- Provide for improved public access and compatible passive recreation, consistent with the conservation of significant coastal resources.
- Protect Devereux Creek, Devereux Slough and the adjacent upland and marine habitats.
- Preserve and protect and restore identified sensitive habitat areas, including wetland, native grassland, dune, back dune, and freshwater pond habitat.
- Provide residential and open space land uses that are consistent, to the extent feasible, with the California Coastal Act policies, and with the prior development plans and expectations

for the West Devereux property (now the University's North Campus) that was set forth for this area through standards in the Santa Barbara County Local Coastal Plan.

6.4.6 Alternative 5: Off-Site Alternative

6.4.6.1 Description

This alternative proposes development of the residential components of the project at an off-site location to determine whether development at off-site location would reduce potential impacts. As the proposed project includes both faculty and family student housing, both residential components under this alternative would be developed elsewhere. Two locations for this alternative have been identified, one for faculty housing, and the other for the family student housing. The alternative site for faculty housing is the St. Vincent's Property, a 31.8-acre site on Via Chaparral, north of Cathedral Oaks, and west of SR-154 (San Marcos Pass Road). The alternative site for the family student housing is a 14.2-acre property on the north side of Hollister Avenue across from the eastern end of the Sandpiper Golf Course. This site is immediately northwest of the Joint Proposal Area and is referred to herein as the Sandpiper site. (Refer to Figure 6-7.) These alternatives are considered to representative of the potential benefits and impacts of shifting presently proposed development from the North and West Campuses. As a general matter, shifting development avoids the immediately foreseeable impacts of developing on the North and West Campuses. Sensitive resources on the North and West Campus would not be impacted by the presently proposed project. Other development impacts (such as traffic impacts, and other local development impacts) would be shifted from one location to another, but would not be avoided.

Over the long term, demand for additional student and faculty housing would still remain, and it is likely that the North and West Campuses would be utilized to meet such needs. Therefore, the potential impacts to sensitive resources on such parcels would merely be deferred, not permanently avoided. By contrast, by implementing the Joint Plan, the proposed project would achieve the balance of protection of sensitive coastal resources that is most beneficial, and 652 acres of contiguous open space would be preserved.

Development of the 14.2-acre Sandpiper site identified for the family student housing project was analyzed in September 2001, through a Supplemental Environmental Impact Report for the "Residences at Sandpiper," prepared by the Santa Barbara County Planning and Development Department. That Supplemental EIR (SCH#1993121097) [hereinafter referred to as the "2001 Supplemental EIR"] addressed the potential impacts of a new 119-unit residential community on the site. In addition, a "reduced project" alternative, consisting of 89 residential units, was assessed in that Supplemental EIR.

The description of the potential impacts of the alternative family student housing site would largely be the same as the project analyzed as the proposed project in the 2001 Supplemental

EIR, since that EIR analyzed development of 119 units, and 151 units of family student housing are proposed. The conclusions of that Supplemental EIR are reported below, where relevant.

6.4.6.2 Geology and Geologic Hazards

Under this alternative, development of 236 units of faculty housing on the 31.8-acre St. Vincent's site, and development of 151 units of family student housing on the 14.2-acre Sandpiper site would expose people and/or structures to potentially adverse effects related to seismic ground shaking (Impact 4.2-1). Although no known faults traverse either site, residential development would occur in a seismically active area, with active faults located throughout the area. Implementation of MM 4.2-1(a) (setback from coastal bluffs), MM 4.2-1(b) (adherence to recommendations of a project-specific geotechnical report, and MM 4.2-1(c) (setbacks from potential hazards based on geotechnical studies) would reduce potential impacts to a *less-than-significant* level. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Under this alternative, construction of residential structures on 31.8 acres at the St. Vincent's site, and 14.2 acres at Sandpiper site could result in substantial soil erosion and the loss of topsoil (Impact 4.2-2). The property near the Sandpiper Golf Course is relatively flat, similar to the proposed project site and would result in similar erosion-related impacts; however, the St. Vincent's site consists of rolling hills with steeper slopes. Erosion during construction would be minimized by incorporating all recommendations regarding erosion potential outlined in geotechnical and soil analyses prepared for residential developments under MM 4.2-1(c). In addition, implementation of MM 4.2-2(a) through 4.2-2(e) during development of this alternative would further reduce effects from erosion, and impacts would be reduced to a *less-than-significant* level. As residential development would occur over a steeper area and require extensive grading within the St. Vincent's portion of the alternative sites, potential impacts would be greater than the proposed project.

Under this alternative, development of residential structures on approximately 46 acres within the alternative sites could occur on soils of varying soil and slope stability (Impact 4.2-3), including steeper slopes at the St. Vincent's property. Detailed soil investigations are not available for all portions of the alternative sites. Soils are likely are prone to erosion, and may have shrink-swell potential, and potential for subsidence and liquefaction. While project development as proposed could potentially result in exposure of structures or people to hazards of geological instability, implementation of the MM 4.2-1(a) through 4.2-1(c), would reduce this impact to a *less-than-significant* level. As residential development would occur over a steeper area at the St. Vincent's portion of the alternative sites, potential impacts would be greater than the proposed project.

Under this alternative, development of residential structures on approximately 46 acres within the alternative sites could occur in areas underlain with expansive soils (Impact 4.2-4), including the presence of plastic, highly expansive clays at the property near the Sandpiper Golf Course.

The University would implement MM 4.2-1(c), to require a site-specific geotechnical study including analyses of soils at development sites and incorporation of recommendations to reduce potential geologic hazards. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

6.4.6.3 Hydrology and Water Quality

Under this alternative, development of residential structures on approximately 46 acres within the alternative sites would not violate existing water quality standards or waste discharge requirements (Impact 4.3-1). Under this alternative, the University would prepare a Stormwater Pollution Prevention Plan for project components that would disturb one acre or greater and implement applicable provisions of the UCSB SWMP. In addition, MM 4.3-1 would require compliance with applicable water quality requirements established by the Central Coast RWQCB. With implementation of the identified stormwater programs and mitigation measure, this impact would be reduced to a *less-than-significant* level. As the same amount of residential development would occur, although the housing would be developed at two off-site locations, potential impacts would be comparable to the proposed project.

Under this alternative, development of residential structures on approximately 46 acres within the alternative sites would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge (Impact 4.3-2). With an assumption of 50 percent coverage as part of development plans, this alternative would result in approximately 23 acres of additional impervious surface (essentially the same as the proposed project's nearly 22.7 acres of additional impervious area). The increase in impervious surface (of approximately 5.8 percent of the total project area) would not result in substantial decrease in groundwater recharge. Development of 387 residential units would increase demand for potable water, which would result in minor increase for groundwater; however, this increase would not substantially deplete groundwater supplies, and this impact would *less than significant*. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Under this alternative, residential development would not substantially alter site drainage patterns and result in substantial erosion or siltation on or off site (Impact 4.3-3). Residential development would result in new drainage systems to control runoff from impervious surfaces over a 46-acre area; however, runoff would be discharged into Devereux Creek and its tributaries from the property near the Sandpiper Golf Course and into Atascadero Creek and its tributaries from the St. Vincent's property, similar to existing conditions. Under this alternative, the University would implement applicable provisions of the SWMP to control erosion during construction and operation and this impact would be *less-than-significant*. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Under this alternative, residential development would not substantially alter site drainage patterns or substantially increase the rate or amount of surface runoff and result in flooding either on or off site (Impact 4.3-4). Residential development would increase impervious surfaces within the alternative sites by approximately 23 acres and, thereby, increase stormwater runoff that would be discharged into Devereux Creek and its tributaries from the property near the Sandpiper Golf Course and into Atascadero Creek and its tributaries from the St. Vincent's property, similar to existing conditions. However this increase would not be substantial in relation to existing discharge from the alternative sites, and this impact would be *less than significant*. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Under this alternative, residential development would not create runoff that would exceed the capacity of existing storm drain systems or provide substantial sources of polluted runoff (Impact 4.3-5). Residential development would increase impervious surfaces within the project area by approximately 23 acres and, thereby, increase stormwater runoff and pollution carried in surface runoff that would be discharged into Devereux Creek and its tributaries from the property near the Sandpiper Golf Course and into Atascadero Creek and its tributaries from the St. Vincent's property, as with existing conditions. Under this alternative, the University would prepare a Stormwater Pollution Prevention Plan for components of this alternative that would disturb one acre or greater and implement applicable provisions of the UCSB SWMP and this impact would be *less than significant*. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Residential development would require the construction of new stormwater drainage systems; however, these new or expanded facilities would not result in significant impacts (Impact 4.3-6). As noted above, the University would install a culvert on Devereux Creek to increase discharge capacity and reduce upstream flooding potential, the installation of which could result in adverse impacts to riparian vegetation in an upstream debris basin. Implementation of MM 4.4-2(d) (Wetlands and Environmentally Sensitive Habitat Restoration Plan), discussed in Section 4.4 (Biological Resources) would reduce potential adverse impacts. With implementation of the identified mitigation measures, this impact would be reduced to a *less-than-significant* level. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Residential development would not otherwise substantially degrade water quality (Impact 4.3-7). Under this alternative, the University would prepare a Stormwater Pollution Prevention Plan for project components that would disturb one acre or greater and implement applicable provisions of the UCSB SWMP and this impact would be *less than significant*. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Under this alternative, residential development would not place housing within a 100-year flood hazard area (Impact 4.3-8). Under this alternative, development of housing would not be subject to flooding hazards associated with a 100-year flood hazard zone. Thus, *no impact* would occur. As residential development within the 100-year flood hazard zone would not occur on the alternative sites, potential impacts would be comparable to the proposed project.

Under this alternative, development would not occur within a 100-year flood hazard area in either of the alternative off-site locations, which could impede or redirect flood flows (Impact 4.3-9). Thus, *no impact* would occur. As development would not occur within the 100-year flood hazard zone, potential impacts would be less than the proposed project.

Under this alternative, residential development would alter site drainage patterns in both off-site locations but not expose people or structures to significant risk of loss, injury, or death involving flooding (Impact 4.3-10). This impact would be *less than significant*. Although residential development would occur at two off-site locations, as the same amount of land area would be subject to development, potential impacts would be comparable to the proposed project.

Under this alternative, residential development would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow (Impact 4.3-11). Neither of the alternative sites is located near a body of water of sufficient size to pose a risk from seiche. In addition, overall slopes within the property near the Sandpiper Golf Course are not sufficiently great to create substantial risks from mudflows; however, the St. Vincent's site consists of steeper slopes and would result in greater mudflow-related impacts than the proposed project. As most of the alternative site areas are above the estimated tsunami inundation elevations in the Santa Barbara area, of approximately 5.5 feet for a 100-year event and approximately 11 feet for a 500-year event, impacts would be *less than significant*. Although the same amount of units of housing would be provided, the St. Vincent's site would be more susceptible to mudflow-related impacts; thus, potential impacts would be greater compared to the proposed project.

6.4.6.4 Biological Resources

Under this alternative, residential development would result in adverse impacts to candidate, sensitive, or special-status plant and wildlife species (Impact 4.4-1). Residential development on the alternative sites would occur over an area of approximately 46 acres, compared to approximately 43.3 acres for the proposed project. The loss of undeveloped areas could remove special-status plants, and remove and modify raptor foraging areas and potential nesting sites. Under this alternative, the University would implement LRDP programs and policies and MM 4.4-1(a) through 4.4-1(o) and 4.4-2(e), which would reduce potential adverse effects, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations; or by the CDFG or USFWS to less-than-significant levels. With implementation these Mitigation Measures, this impact would be reduced to a *less-than-significant* level. As residential development would occur over a slightly larger area, potential impacts would be greater than the proposed project.

Under this alternative, residential development would result in substantial adverse effects on sensitive natural communities (Impact 4.4-2). Residential development on the alternative sites would occur over an area of approximately 46 acres. No open space improvements would occur in these project site areas. Residential development could adversely affect special-status habitats, including riparian habitats and their channels (on the St. Vincent's site), native grasslands, and Venturan coastal sage scrub. With the combination of impact avoidance, and implementation of LRDP policies and programs and MM 4.4-1(a) through 4.4-1(o), and MM 4.4.2(a) through 4.4-2(e), this alternative would not result in a substantial adverse effect in the modification or removal of vegetation communities or habitats that are designated and/or identified as sensitive by the CDFG, USFWS, and/or California Costal Commission (CCC) local agencies, and this impact would be reduced to a *less-than-significant* level. As residential development would occur over a slightly larger area, potential impacts would be greater than the proposed project.

Under this alternative residential development would result substantial adverse effects on federally protected wetlands through direct removal, placement of fill, or hydrological interruption (Impact 4.4-3). For this alternative, it is assumed that wetland impacts on the Sandpiper and the St. Vincent's sites would be less than the proposed project. With the combination of impact avoidance, existing wetland enhancement and restoration activities, required federal and State permitting, and implementation of LRDP programs and policies, as well as MM 4.4-1(a) through MM 4.4-1(o) and 4.4-2(d), this alternative would not result in a substantial adverse effect on federally protected wetlands through direct removal, filling, or hydrological interruption, and this impact would be reduced to a *less-than-significant* level As residential development under this alternative would affect fewer wetland areas, potential impacts would be less than the proposed project.

Under this alternative, residential development could interfere with the movement of native resident or migratory wildlife species, including migratory birds and raptors (Impact 4.4-4). Residential development on the alternative sites would occur over an area of approximately 46 acres. Compared to the proposed project, development on the alternative site properties would result in the loss of more undeveloped open space, which provides forage areas for raptors. With minimization of outdoor lighting and short-term nature of construction fencing, this alternative would not interfere with the movement of native resident or migratory wildlife species or corridors and this impact would be reduced to a *less-than-significant* level. Since slightly more undeveloped land area would be subject to development, potential impacts to wildlife movement would be greater than the proposed project.

Under this alternative, residential development would be in substantial conformance with local applicable policies protecting biological resources (Impact 4.4-5). As a state entity, UCSB is not subject to municipal plans, policies, and regulations, such as the County and City General Plans or local ordinances, and this impact would be *less than significant*. As no local plans, policies, and regulations would apply to this alternative, potential impacts would be comparable to the proposed project.

Under this alternative, residential development would not conflict with the provisions of an applicable habitat conservation plan (Impact 4.4-6). As there are no existing HCPs, NCCPs, or other approved local, regional, or state habitat conservation plans that are applicable to this alternative's two off-site locations, *no impact* would result, comparable to the proposed project.

6.4.6.5 Hazards and Hazardous Materials

Under this alternative, residential development would not expose University occupants or the public to significant hazards due to the routine transport, use, disposal, or storage of hazardous materials (Impact 4.5-1). This alternative could result in potential exposure of residential occupants and the public to hazards associated with the routine transport, use, disposal, or storage of hazardous materials associated with the existing EMT (EMT), which stores oil extracted from inland wells and then periodically conveys the stored oil to an offshore barge for collection, as well as SCE's transmission lines and Reliant Peaking Facility, proximate to the property near the Sandpiper Golf Course. There are no known potential hazards associated with historic use of the St. Vincent's Property site. The generation of electromagnetic fields (from the SCE transmission lines and Reliant Peaking Facility) proximate to the property near the Sandpiper Golf Course could pose a hazard to occupants of residential development. Under this alternative and consistent with LRDP policy 30232.2, the campus would provide emergency clean-up procedures if an accidental exposure or spill occurs. In addition and consistent with LRDP Policy 30232.4, the University will continue to strengthen waste minimization efforts by the EH&S Office, with particular consideration given to monitoring of hazardous materials storage and handling procedures, recycling (on-site and off-site), source reduction goals and implementation procedures, and informational and educational programs. Therefore, campus compliance with laws and regulations via existing programs would ensure that risks resulting from the routine use and transport of hazardous materials remain *less than significant*. As residential development would occur on the property near the Sandpiper Golf Course, in closer proximity to the SCE peaking facility but further from the EMT facilities, potential impacts would be comparable to the proposed project.

Under this alternative, construction of residential development could expose workers to health and safety risks through earthmoving activities in areas with potentially contaminated soils or groundwater (Impact 4.5-2). Although no oil field operations appear to have occurred on the alternative sites, given the proximity of the property near the Sandpiper Golf Course to historic oil production uses, the potential exists for hazardous materials to be encountered during grading or soil disturbance within the alternative sites. Consistent with LRDP policies 30232.1, 30232.2, and 30232.3 and as part of implementation of this alternative, federal and state law as well as all UCSB procedures for handling hazardous wastes would be extended to all new development associated with this alternative. In addition, in order to address the potential for encountering unidentified contamination, the campus would implement MM 4.5-2, which would require continued implementation of health and safety plans, programs, and procedures related to the use, storage, disposal, or transportation of hazardous materials that outline safe handling practices and provide for emergency clean-up procedures if an accidental exposure during earthmoving activities occurs, all in compliance with federal and State laws. With

implementation of MM 4.5-2, this alternative would not expose construction workers to health and safety risks through earthmoving activities, and this impact would be reduced to as *less-than-significant* level. As residential development would occur over a slightly larger area, potential impacts would be greater than the proposed project.

Under this alternative, construction of residential development could expose construction workers and occupants of new residential structures to the naturally occurring hazards of Radon-222, natural gas and oil seeps (Impact 4.5-3). These geohazards have the potential to result in a hazard to future residents of this alternative's development. However, in conjunction with residential development and management of the COPR area and consistent with LRDP policies 30232.1, 30232.2, and 30232.3, the campus will continue to implement an array of campus EH&S programs and other regulations related to hazardous materials in compliance with federal and state hazardous materials laws. In addition, implementation of a buffer zone along any natural seeps that may be close to structures or residences and implementation of MM 4.5-2 in the event unanticipated contamination is discovered would ensure safety of residents located near them. The University would also implement MM 4.5-3, to require field testing for the presence of radon gas and measures to reduce any such hazards found. With implementation of MM 4.5-2 and 4.5-3, this impact would be reduced to a *less-than-significant* level. As residential development would occur over a slightly larger area, potential impacts would be greater than the proposed project.

Under this alternative, construction of residential development could expose construction workers and the public to potential health risks associated with abandoned oil wells (Impact 4.5-4). Construction of residential structures would not result in development in areas with known former wells but could result in discovery of unknown abandoned oil wells (on the Sandpiper site). The potential risks, if any, would be reduced by implementation of MM 4.5-4(a) and 4.5-4(b) which ensure site characterization, well re-abandonment, and procedures in the event of discovery of oil wells. This alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and this impact would be reduced to a *less-than-significant* level. As less development would occur within areas of known historic oil production, the risks of accidental discovery of an oil well would be less than under the proposed project.

Under this alternative, no open space improvements would occur that could expose the public to potential health risks in the event of the accidental discovery of an abandoned oil well during recreational use of open space areas (Impact 4.5-5); thus, *no impact* would occur. Although the same amount of development would occur under this alternative, the risks of accidental discovery of an oil well during recreational use would not exist, and this impact would be less than under the proposed project.

Under this alternative, residential development could expose the public to potential health risks in the event of an accident or accidental release from the EMT (Impact 4.5-6). An accident, including fire, or accidental release of petroleum stored within the two tanks at the EMT or in

the pipelines running to and from the facility could expose the public to potential health risks. Major hazardous materials accidents are extremely infrequent, and additional emergency response capabilities are not anticipated to be necessary, since no increase in the number of incidents that could result at the EMT would result from implementation of this alternative. Per MM 4.5-6, this alternative would not place any residential structures within 585 feet of the nearest EMT storage tank. In addition, the campus would comply with federal and state laws and regulations regarding hazardous materials by continuing to implement health and safety plans, programs, and procedures related to the use, storage, disposal, or transportation of hazardous materials (consistent with LRDP policy 30232.1 and 30232.3), as well as provide for emergency clean-up response procedures to minimize the risk if an accidental exposure, release, or spill occurs (consistent with LRDP policy 30232.2). Thus, with implementation of MM 4.5-6, no significant hazard to the public or the environment is anticipated from foreseeable upset at the EMT, and a *less-than-significant* impact would result with respect to a public hazard as a result of foreseeable upset or accident conditions at the EMT involving the release of hazardous materials into the environment. As the same amount of units of housing would be provided but less proximate to the EMT under this alternative, potential impacts would be less than under the proposed project.

Under this alternative, residential development would not result in construction on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Impact 4.5-7). Based upon review of federal, state, and county hazardous waste lists and databases, no known hazardous materials sites exist within the alternative sites. Therefore, this alternative would not involve construction on any site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and there would be *no potential impact*. As this alternative would not result in development on any sites included on a list of hazardous materials sites, potential impacts would be comparable to the proposed project.

This alternative would not result in a significant safety hazard for people residing or working in the alternative sites associated with proximity to the Santa Barbara Municipal Airport (Impact 4.5-8). The alternative sites are not within the Approach Zone of the Santa Barbara Municipal Airport. Under this alternative, a fewer number of persons would be exposed to potential hazards associated with aircraft overflight. However, use of the residential units would not result in a hazard in and of itself. There is a low rate of airplane accidents nationwide, and strict compliance with all FAA regulations related to aircraft and pilot safety, such as pilot training, aircraft inspection and certification, and air traffic control, are intended to assure the continue safety of aircraft operations. The University also maintains an Emergency Operations Plan (EOP), which is designed to assist preparation and response to all levels of emergencies. Thus, with continued implementation of public safety and emergency operation procedures, this impact would be *less than significant*. As no additional persons would reside within the Approach Zone of the Santa Barbara Municipal Airport under this alternative, potential impacts would be less than under the proposed project.

This alternative could impair implementation of, or physically interfere with, an adopted emergency response plan (Impact 4.5-9). Construction and operation activities associated with

this alternative could potentially affect emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access to the sites. UCSB maintains an EOP, disseminated campuswide, that outlines procedures for all University staff, students, and visitors to follow in case of an emergency, and is intended to assist the University in preparation for and response to all levels of emergencies. Following MM 4.5-9(a) and 4.5-9(b) would be required to ensure that this alternative's development would not impair implementation of, or physically interfere with, emergency response and evacuation efforts. Implementation of MM 4.5-9(a) and 4.5-9(b) would ensure that impacts associated with emergency response or evacuation would be *less than significant* by providing multiple emergency access or evacuation routes (revising the EOP as necessary) and coordinating roadway or travel lane closures with emergency response personnel. As the same amounts of housing would be provided under this alternative, potential impacts would be comparable to the proposed project.

This alternative could expose people or structures to a risk of loss, injury, or death involving wildland fires (Impact 4.5-10). Under this alternative, residential development would occur on the Sandpiper site and the St. Vincent's property. As the same amount of residential structures would be constructed at these two locations (compared to the proposed project), the same number of structures could be at risk of loss, injury, or death involving wildland fires. Most of the property near the Sandpiper Golf Course proposed for development is generally considered a light fuel area with annual grasses, and as such is less vulnerable to large conflagrations; however the St. Vincent's property is a hillside property that is generally considered a higher fuel area with chaparral, trees, and annual grasses. Implementation of MM 4.6-10(a) through 4.6-10(f) would reduce potential increases risk of wildland fires through landscaping techniques and adherence to fuel management procedures, and this impact would be reduced to a *less-than-significant* level. This conclusion is consistent with the findings in the Sandpiper Initial Study, which concluded that there would be no introduction of development into an existing high fire hazard area and that impacts would not be significant. As the same number of locations and housing units would be developed with housing under this alternative, potential impacts would be comparable to the proposed project.

6.4.6.6 Land Use

This alternative would be largely consistent with applicable land use plans, policies, and regulations, including the Santa Barbara Municipal Airport Land Use Plan (Impact 4.6-1). Under this alternative, development of 387 housing units on approximately 46 acres of land and open space improvements within the project area would occur, and the conformance of this alternative with each applicable plan is discussed below in bulleted format. This impact would be *less than significant*. As this alternative would entail the same amount of housing development, land use impacts would be comparable to the proposed project, as pertains to each individual plan discussed below.

- California Coastal Act. The St. Vincent's site is located outside of the coastal zone, and Coastal Act policies would not apply. The alternative site located near the Sandpiper Golf Course is located within the Coastal Zone. Development on the Sandpiper site would result

in inconsistencies with the Coastal Act including Sections 30233 and 30255 related to filling of wetlands, and Section 30251 related to protection of visual resources. In addition, the beneficial impacts associated with implementation of the Open Space Plan would not occur.]

- Goleta Community Plan. Residential development on the Sandpiper site would be largely in conformance with the development standards in the Local Coastal Plan portion of the Goleta Community Plan, and development under this alternative would also be anticipated to be consistent with the GCP. Any inconsistency of the proposed LRDP amendment with GCP development standards does not constitute a significant impact, as the GCP is not a governing land use document for the University.

- Regional Growth Forecast. This alternative is consistent with the relevant recommended policies regarding the county's jobs-housing balance as presented in the Santa Barbara County Association of Governments, Regional Growth Forecast 2000 (RGF). While these policies have not been formally adopted, in this analysis, the University considers compatibility of this alternative with the relevant policies that were recommended in the document. This alternative would provide the same amount of housing as under the proposed project; therefore, the alternative would address the issues raised by the RGF policies to a similar extent as the proposed project does, and would have a comparable impact to the proposed project.

- Clean Air Plan. This alternative would conform to the Clean Air Plan (CAP) adopted by the Santa Barbara County Air Pollution Control District (SBCAPCD). This alternative would provide the same amount of housing as under the proposed project; however, as the housing would be located farther from campus, this could result in increase in VMT. However, this alternative would address the issues raised by the recommended CAP policies to a similar extent as the proposed project, and would have a comparable impact.

- Central Coast Basin Plan. This alternative would conform to the Central Coast Basin Plan, adopted by the Central Coast RWQCB (RWQCB). The University has applied for NPDES Phase II permit and has prepared a SWMP, and would be obligated to follow all relevant regulations guiding construction and operation pertaining to the development of this alternative. As the same amount of housing development would occur under this alternative, consistency with the Central Coast Basin Plan would be comparable to the proposed project.

- Airport Land Use Plan. This alternative is consistent with the Airport Land Use Plan. No portion of the site falls within the Approach Zone, and, therefore, does not conflict with any safety recommendations of the ALUP; thus, no impact would occur. Consequently, this alternative is less than under the proposed project with respect to consistency with the ALUP, since this alternative overcomes the finding of significant, unavoidable status for this impact.

Therefore, the alternative would not be in conflict with any applicable plan, and this impact would be *less than significant*. As residential development would occur over a larger area and less open space would be preserved and restored, potential land use impacts would be greater than the proposed project.

6.4.6.7 Agricultural Resources

No portion of the alternative sites is considered Prime Farmland, or Farmland of Statewide Importance. In addition, no portions of the alternative sites are zoned for agricultural use or are covered by a Williamson Act contract. Thus, *no impact* would occur under this alternative.

6.4.6.8 Mineral Resources

This alternative would not result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state (Impact 4.8-1). For the alternative sites, no known economically recoverable mineral resources are located within the areas of proposed residential development. No known historic oil and gas operations have occurred in the either alternative site areas. Thus, development of the alternative sites would not interfere with existing oil recovery operations, and *no impact* would occur.

In addition, this alternative would not result in loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan (Impact 4.8-2). Neither of the alternative sites is delineated as mineral resource recovery sites in the General Plan for the City or County or Santa Barbara, which covers the project area. As noted above, residential development would not interfere with existing oil recovery operations, since no such operations are at either alternative site location. *No impact* would occur.

6.4.6.9 Visual Resources

Under this alternative, development of 236 units of faculty housing on the 31.8-acre St. Vincent's site, and development of 151 units of family student housing on the 14.2-acre Sandpiper site would not have a substantial adverse effect on a scenic vista (Impact 4.9-1). Development of residential structures on either site would replace undeveloped open area with residential structures. Portions of the Sandpiper site have views of the surrounding undeveloped areas, including the Sandpiper Golf Course, which would be blocked by structures up to 35 feet in height. However, these are not publicly held views and do not meet the criteria of a scenic vista as defined in Section 4.9 (Visual Resources). Views of the Santa Ynez Mountains or the ocean would not be blocked. Due to the extensive grading that would be required to develop the St. Vincent's site, and the surrounding topography (which includes residential areas at a higher elevation), development on the St. Vincent's site would not block or obstruct any scenic vistas. The University would design new structures in conformance with the scale and character of surrounding development, with clustered developments encouraged, height restrictions on buildings, preservation of existing native trees and significant stands of trees pre-dating University acquisition, selectively trimming trees or shrubs to provide views to and along the ocean and scenic coastal areas, and preservation of specimen trees or groves. As no scenic vistas would be blocked by the development, this impact would be *less than significant.* Although development would occur at two locations, this impact would be comparable to the proposed project.

This alternative would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (Impact 4.9-2). The site near the Sandpiper Golf Course is not located within a state scenic highway; however, the St. Vincent's site is located approximately 200 yards west of the SR-154 highway, which is officially designated as a state scenic highway (California Department of Transportation, Office of State Landscape Architecture, California Scenic Routes 2003). Due to the extensive grading that would be required to development this site, trees on the site would likely be removed by development. However, any such trees are located within the drainage channels on the site, which are not visible from the SR-154, due to intervening topography. This impact would be *less than significant*. Although this impact would be less than significant, as development would occur in proximity to a designated state scenic highway, this impact would be greater than the proposed project.

This alternative could substantially degrade the visual character or quality of the alternative site areas (Impact 4.9-3). Development of residential structures on the alternative sites would result in the conversion of undeveloped open space into the site of permanent residential structures, with parking integrated into, or adjacent to, the housing structures. However, both of the alternative sites of residential development are contiguous with adjacent residential land uses. The University would build new structures in conformance to the scale and character of surrounding development, as discussed in the analysis above. However, even with implementation of MM 4.9-3(a) through 4.9-3(h), this impact would be *significant and unavoidable*. Because of the conversion of undeveloped open space to residential uses, this impact would be greater than the proposed project

This alternative could create new sources of substantial light or glare in the project area or vicinity that would adversely affect day or nighttime views from adjacent land uses (Impact 4.9-4). This alternative could create new sources of substantial light or glare in the alternative site areas or vicinity that would adversely affect day or nighttime views from adjacent land uses by developing residential structures on the alternative sites which would result in the introduction of new sources of nighttime illumination at locations where there currently is none, and could create daytime glare impacts from highly reflective surfaces. To reduce this impact to a less-than-significant level, this alternative would implement MM 4.9-4(a) requiring that design of residential structures minimize use of reflective mirrored glass for windows, and where feasible, maximize use of nonreflective, textured materials to minimize glare and 4.9-4(b) specifying that all outdoor lighting be directed to prevent stray light spillover, and elevated fixtures be shielded, will be necessary. With implementation of the identified mitigation measures, this impact would be reduced to *less than significant*, comparable to the proposed project.

6.4.6.10 Recreation

This alternative could increase use of recreational facilities within the City of Goleta, City of Santa Barbara, and UCSB campus (Impact 4.10-1); however with inclusion of recreational facilities with new student and faculty residential development (consistent with LRDP Policy 30221.1), these impacts would be reduced to a *less-than-significant* level. Under this alternative, the

same amount of housing development would occur as under the proposed project; however, recreational open space management and improvements would not be included as part of the scope as that of the proposed project. With additional housing provided under this alternative, there could be greater use of recreational facilities within the City of Goleta, City of Santa Barbara, and the UCSB campus, which could result in accelerated deterioration of these facilities. However, provision of recreational amenities as part of this alternative's faculty and student housing components would help offset the effects of any increased use; therefore, this impact would be reduced to *less than significant*. As the same amount of residential development would occur under this alternative, potentials impacts would be comparable to the proposed project.

This alternative would include recreational facilities associated with residential development, construction of which would not have an adverse physical effect on the environment (Impact 4.10-2). The same number of housing units would be built under this alternative as the proposed project and would include on-site recreational facilities such as a swimming pool and recreation center for the faculty housing, and basketball courts, a toddler play area, and a community center at the family student housing. The relatively small overall square footage of these facilities and improvements would not result in significant adverse physical effects on the environment. The construction and operation of recreational facilities could contribute to the effects on air quality, noise, biological resources, and other resources; however, with the incorporation of mitigation measures discussed under the relevant resource sections in the analysis of this EIR, and due to the relatively small amount of recreational facilities that are proposed, the construction and operation of these facilities would result in *less-than-significant* environmental impacts. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

This alternative would not result in the loss of existing recreational opportunities (Impact 4.10-3). Both alternative sites are currently vacant, with no formalized recreational facilities. In addition, private recreational facilities within the proposed individual faculty and student housing developments would provide additional active recreation opportunities. This would be a *less-than-significant* impact. This impact would be greater than under the proposed project, for which the impact was analyzed as less than significant. However, it should be noted that this alternative would not implement the Joint Proposal and Open Space Plan and therefore would not result in the provision of 652 acres of contiguous open space, which would reduce future recreational opportunities along the Central Coast.

6.4.6.11 Cultural Resources

Implementation of this alternative would not result in the modification or demolition of structures that have been designated as eligible or potentially eligible for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR), as this alternative would not modify or demolish any existing structures as part of the project, therefore no impact would result (Impact 4.11-1). As residential development would not modify or demolish any existing structures, this impact would be comparable to the proposed project.

Construction activities associated with implementation of this alternative could result in damage to or the destruction of known and unknown archaeological resources (Impact 4.11-2). This alternative develops housing that would require disturbance of approximately 31.8 acres of land on the St. Vincent's property and 14.2 acres of land on the property near the Sandpiper Golf Course. Thus, the proposed alternative could result in disturbance of up to 46 acres of land for housing, as compared to disturbance of approximately 43.3 acres of land for housing under the proposed project. Since, no open space management and improvements would occur, as compared to the proposed project, this alternative could potentially result in less opportunities for people to encounter or disturb archaeological sites, known or unknown. There is the potential for undocumented archaeological sites to exist. Thus, development associated with this alternative could result in the disturbance or destruction of known and unknown archaeological resources. To mitigate this impact to a *less-than-significant* level, the University would implement MM 4.11-2(b) through 4.11-2(e) and MM 4.11-2(h). As residential development would not occur in areas with known cultural resource sites, potential impacts would be less than the proposed project.

Construction activities associated with implementation of this alternative could result in damage to or the destruction of paleontological resources (Impact 4.11-3). Ground-disturbing activity (grading) would occur as part of the scope of this alternative. Paleontological resources could be found on the alternative sites, since the County is rich with marine fossil resources. However, were vertebrate fossils to be found during construction activities associated with implementation of this alternative, these would be considered rare and could have the potential to answer important scientific questions, and the damage to or destruction of such resources would be considered a significant impact. To mitigate this potential impact to a *less-than-significant* level, the University would implement MM 4.11-2(d) and 4.11-2(e). As the same amount of residential development would occur under this alternative, potential impacts would be comparable than the proposed project.

Construction activities associated with implementation of this alternative could result in the disturbance of human remains (Impact 4.11-4). There could be archaeological sites in the alternative sites, including ones that could yield human remains. Although no part of the alternative sites has a recorded use as a human cemetery, the potential exists for human remains to be uncovered as a result of ground-disturbing activities associated with construction of this alternative. Since no open space management and improvements would occur, as compared to the proposed project, this alternative could potentially result in fewer opportunities for people to encounter or disturb previously unknown archaeological sites with human remains. To mitigate this potential impact to a *less-than-significant* level, MM 4.11-4 would be implemented. As the same amount of residential development would occur under this alternative, but slightly more acreage disturbed by construction activities, potential impacts would be greater than the proposed project.

6.4.6.12 Traffic and Circulation

Under this alternative, residential development would result in additional vehicular trips that would increase traffic volumes on the local street and highway network and degrade intersection levels of service (Impact 4.12-1). Development of 236 units of faculty housing on the 31.8-acre St. Vincent's site, and development of 151 units of family student housing on the 14.2-acre Sandpiper site would generate additional vehicle trips which would primarily impact Hollister Road (for the Sandpiper site) and Cathedral Oaks (for the St. Vincent's site). As the same number of units would be developed, trips from the residential development would be equivalent to the proposed project; however, these trips would occur at two separate locations: one east of the campus and one west of the campus. The University would be consistent with LRDP policies related to implementation of a transportation demand management program. Because of the two locations of the alternative sites, no adverse impacts to any intersections are anticipated, and this impact would be less than significant. As no intersections would be significantly impacted, potential impacts would be less than the proposed project.

Construction activities associated with implementation of this alternative would result in additional vehicular trips that would increase traffic volumes on the local street and highway network and could degrade intersection levels of service (Impact 4.12-2). As residential development would occur on the Sandpiper site and the St. Vincent's site, construction trips could affect locations in proximity to those sites. However, as typical construction hours are 7:00 am to 3:30 pm, few, if any, construction-related trips would affect any intersections during the PM Peak Hour. Thus, construction trips resulting from either residential development would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system, and this impact would be *less than significant*. As development would occur at two separate locations under this alternative, construction traffic would be more widely dispersed throughout the street network and potential impacts would be less than the proposed project.

Development of this alternative would result in additional vehicular trips that could exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (Impact 4.12-3). Residential development of 387 units would result in the generation of vehicle trips by the occupants of the new housing. However, as development would occur at two distant locations, trips from those locations would be more widely dispersed onto the local street system and no impacts to highways designated in the congestion management program are anticipated. As development would occur at two locations under this alternative, potential impacts would be less than the proposed project.

Development of this alternative would include new vehicular circulation elements, which would not result in hazards due to design features or incompatible land uses (Impact 4.12-4). It is anticipated that any new roadway segments that serve new residential development would employ the use of standard engineering practices (e.g., use of standard road and driveway widths, provision of adequate sight lines, and avoidance of sharp turning radii) and traffic mitigation

strategies (e.g., installation of control devices such as stop signs or signal lights as needed) to avoid design elements that could result in hazards due to features such as sharp curves or dangerous intersections. With use of standard engineering practices, this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Implementation of the alternative would increase traffic on local streets and modify pedestrian access routes, which could pose hazards to pedestrians (Impact 4.12-5). Residential development would increase vehicular circulation on local roadways, portions of which are not fully improved with sidewalks on both sides of the roadway. It is assumed that residential development would include sidewalks and/or pedestrian paths. This alternative would not result in pedestrian hazards due to design features or land use incompatibilities, and potential impacts would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Development of this alternative would result in construction activity that could require the short-term closure of traffic lanes or roadway segments, which could result in short-term traffic hazards (Impact 4.12-6). Construction on the Sandpiper site and the St. Vincent's site could impact adjacent streets during delivery of construction materials, installation or extension of utilities, or installation of street or pedestrian improvements. To reduce potential hazards associated with street closures, the University would implement MM 4.14-6, to require maintenance of a single traffic lane at all times, and signal carriers during such periods. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As a similar level of construction activity would occur under this alternative, potential impacts would be comparable to the proposed project.

Construction activities associated with implementation of this alternative could necessitate temporary closure of pedestrian sidewalks and paths or the provision of temporary pedestrian routes, which could result in short-term hazards to pedestrians during construction (Impact 4.12-7). The arrival or departure of construction vehicles and delivery of construction materials could intermittently disrupt pedestrian travel along pedestrian routes adjacent to construction sites. To reduce such possible hazards, MM 14.12-7 would require the provision of alternative pedestrian routes and assure such routes are accessible. With implementation of this mitigation measure, this impact would be reduced to a *less-than-significant* level. As a similar level of construction activity would occur under this alternative, potential impacts would be comparable to the proposed project.

Implementation of the alternative would result in additional vehicular trips that would increase traffic volumes on the local street and highway network and degrade intersection levels of service; however, any such degradation of levels of service would not impair access by emergency vehicles in the long-term (Impact 4.12-8). As discussed above in Impact 4.12-1, most intersections in the alternative vicinity would continue to operate at acceptable levels of service. In cases of traffic delays, emergency vehicles traverse congested roadways generally by requiring vehicles to move over to allow emergency vehicles to pass through. Thus, emergency vehicles

are not anticipated to experience any substantial delays as a result of the significant and unavoidable traffic impacts that would occur and this impact would be *less than significant*. As a similar level of development would occur under this alternative, potential impacts would be comparable to the proposed project.

Under this alternative, construction vehicle trips and short-term roadway closures could impede emergency access. (Impact 4.12-9) As discussed above under Impact 4.12-2, simultaneous construction of faculty and family student housing and open space improvements would generate construction-related vehicle trips; however, any short-term increases in traffic would not substantially increase traffic volumes on any roadways near the alternative sites. The University would implement MM 4.12-9, to require notification of emergency service providers in the event of any project-related street closures. With implementation of the identified mitigation measure, this impact would be reduced to a *less-than-significant* level. As similar levels of construction activity would occur under this alternative, potential impacts would be comparable to the proposed project.

Implementation of the alternative would not result in inadequate parking capacity (Impact 4.12-10). Based on a ratio of approximately 2.19 spaces per unit of housing, 589 spaces would be provided for 269 units of faculty housing and 315 spaces provided for 144 units of family student housing. This supply of parking would adequately meet parking demand associated with residential occupants and their visitors. This impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Construction activities associated with implementation of this alternative would require short-term parking for construction workers (Impact 4.12-11). During construction of the residential structures, construction workers could be present on the two residential development sites. It is anticipated that sufficient area would be available to provide on-site parking for construction, or along adjacent streets. Thus, this alternative would not result in inadequate parking capacity during construction, and this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Development of the alternative would not conflict with applicable policies, plans, or programs supporting alternative transportation (Impact 4.12-12). The development of student housing in a location close to campus (the Sandpiper site) would facilitate the use of alternative modes of travel to the campus, including bicycle commuting on adjacent Class II bike lanes, or taking mass transit from adjacent or proximal bus stops. Residential development would place students in locations more proximate to the campus than where they could locate otherwise in Goleta, Santa Barbara, or the County, and would, therefore, serve as a strategy to reduce long distance vehicular trips to and from the campus. However, residential development at the St. Vincent's site would be farther from the campus, which would increase vehicular trips between the site and the campus. Although a similar amount of residential development would occur, because the

faculty housing would occur at the St. Vincent's site, which is relatively distant from the campus, potential impacts would be greater than the proposed project.

Development of this alternative would increase the on-site residential population, which could increase demand for public transit (Impact 4.12-13). As discussed in Section 4.12 (Traffic and Circulation), adequate transit facilities serve the site, and while the increase in the local population would increase demands for public transit, existing transit facilities could adequately serve demands from proposed development. This impact would be *less than significant* and comparable to the proposed project.

6.4.6.13 Noise

Under this alternative, development of 236 units of faculty housing on the 31.8-acre St. Vincent's site, and development of 151 units of family student housing on the 14.2-acre Sandpiper site could increase ambient noise levels, but would not expose occupants of new on-campus residential development to noise levels in excess of the State's 45 dBA CNEL interior noise standard (Impact 4.13-1). Given existing and projected ambient noise levels, and the anticipated exterior-to-interior noise reduction of 30 dBA or more in new residential buildings, interior noise levels within new residential buildings would not exceed 45 dBA CNEL, and this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Construction activities associated with implementation of this alternative could generate and expose persons to excessive groundborne vibration or groundborne noise levels (Impact 4.13-2). Construction activities would occur in locations near other residential development. Vibration levels could reach up to 81 VdB at the properties located in close proximity the project sites. This would exceed the 80 VdB threshold for residences and buildings where people normally sleep. Therefore, this impact would be potentially significant if it occurs during the hours when most people sleep. With implementation of MM 4.13-2, limiting hours of construction, this impact would be reduced to a *less-than-significant* level. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Operational impacts of this alternative would not generate and expose persons to excessive groundborne vibration or groundborne noise levels (Impact 4.13-3). If this alternative were completed and operational, background vibration levels associated with heating, ventilation, and air conditioning (HVAC) systems equipment in residential buildings would be expected to average around 50 VdB, substantially less than the 80 VdB threshold for residential buildings. Therefore, this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Operation of this alternative would generate increased local traffic volumes, but would not cause a substantial permanent increase in noise levels above existing noise levels (Impact 4.13-4). Development of 236 units of faculty housing on the 31.8-acre St. Vincent's site and development of 151 units of family student housing on the 14.2-acre Sandpiper site would result

in the generation of additional vehicular trips that would increase ambient noise levels in the project vicinity. This increase in traffic in the local vicinity would slightly increase ambient noise levels. This impact would be *less than significant*. As development would occur at two distant locations, localized traffic impacts would be less at any one location, and potential impacts would be less than the proposed project. However, incremental growth in traffic volumes would occur at each location.

Operation of this alternative could add new stationary sources of noise, but would not cause a substantial permanent increase in ambient noise levels (Impact 4.13-5). Development of faculty and family student housing would introduce new sources of stationary noise (e.g., HVAC systems). Residential HVAC systems typically result in noise levels that average between 40 and 50 dBA L_{eq} at 50 feet from the equipment. Given existing ambient noise levels, installation of HVAC systems in new residential buildings would not cause a substantial increase in existing noise levels by 5 dBA CNEL or more. This impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Development of this alternative could result in substantial temporary or periodic increases in ambient noise levels (Impact 4.13-6). Construction of faculty and family student housing would result in the temporary or periodic increases in ambient noise levels associated with typical construction activities, including clearance and grading of sites and framing of structures. The University would implement MM 4.13-6(a), to restrict construction hours, MM 4.13-6(b), to place stationery construction equipment as far away from sensitive receptors as possible and shield where necessary, and MM 4.13-6(c), to require on-site signage listing construction hours and contact information for complaints regarding noise. These measures would not, however, ensure that construction noise levels would not result in a temporary or periodic increase by more than 10 dBA at noise sensitive uses located in close proximity to the construction sites. Therefore, this impact would be *significant and unavoidable*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Development of this alternative would increase the residential population of the project area, but would not expose people residing or working in the project area to excessive noise levels associated with aircraft operations (Impact 4.13-7). Neither the Sandpiper site nor the St. Vincent's site is located within the limits of the 60 dBA CNEL contour for Santa Barbara Airport. Thus, occupants of the new residential structures would not be exposed to excessive noise levels associated with aircraft operations, and this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Similar to the proposed project, this alternative's area is not located within the vicinity of a private airstrip, and *no impact* would result from this alternative (Impact 4.13-8).

6.4.6.14 Air Quality

Implementation of the alternative would result in the emission of additional criteria air pollutants, but would not conflict with or obstruct implementation of the Air Quality Management Plan (Impact 4.14-1). Development of 236 units of faculty housing on the 31.8-acre St. Vincent's site and development of 151 units of family student housing on the 14.2-acre Sandpiper site would increase the amount of occupied building space, increase vehicular trips in the project vicinity and increase operational emissions due to building mechanical equipment. This alternative is consistent with the assumptions used in the CAP. Thus, this alternative would not impair implementation of the Clean Air Plan, and this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Construction activities would result in the generation of criteria pollutants, which would not contribute substantially to an existing or projected air quality violation (Impact 4.14-2). During construction, three basic types of activities would generate emissions: grading as part of site preparation, physical construction, and landscaping. The same number of residential units would be constructed, and, based on modeling performed for the proposed project as analyzed in the Section 4.14 (Air Quality), construction-related annual emissions for this alternative would not exceed SBCAPCD significance thresholds during the construction phases of development. Therefore, this impact would be *less than significant*. To further reduce any impact, and to be in compliance with Air Pollution Control District recommendations, MM 4.14-2 requires a range of dust control measures be implemented, to the extent feasible, during construction. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

This alternative would generate operational emissions from motor vehicles that exceed SBCAPCD thresholds (Impact 4.14-3). Development of 387 units of housing would increase vehicular trips in the project vicinity and increase operational emissions due to building mechanical equipment. Implementation of the open space improvements would increase recreational use of open space areas and contribute to increases in vehicular traffic. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities at the project sites after occupation. Because the daily mobile emissions generated by motor vehicles would exceed the thresholds recommended by the SBCAPCD, and this impact would be *significant and unavoidable*. Although a similar amount of residential development would occur, because of the increased commute distance to the University campus, potential impacts would be greater than the proposed project.

Implementation of this alternative would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (Impact 4.14-4). Construction-related or operational emissions that exceed the thresholds of significance for an individual project would also cause a cumulatively considerable net increase in pollutants in Santa Barbara County and this impact

would remain *significant and unavoidable*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Implementation of the alternative would not expose sensitive receptors to substantial pollutant concentrations (Impact 4.14-5). Residential development would increase vehicular trips, which could result in elevated levels of carbon monoxide at some locations. As development would occur at two relatively distant locations, increases in vehicle trips at individual intersections would be less than the proposed project and this impact would be *less than significant*. As vehicular trips would be less on individual streets, potential impacts would be less than the proposed project.

Implementation of this alternative would not expose sensitive receptors to substantial pollutant concentrations of toxic air emissions (Impact 4.14-6). Toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the project site. Only small quantities of common forms of hazardous or toxic substances, such as cleaning agents, which are typically used or stored in conjunction with residential uses, would be present. Most uses of such substances would occur indoors. Based on the common uses expected on the site, any emission would be minor, and this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

Implementation of this alternative would not create objectionable odors affecting a substantial number of people (Impact 4.14-7). Construction activities occurring in association with the proposed alternative would generate such airborne odors as diesel exhaust and paints or other architectural coatings. Implementation of this alternative would not create objectionable odors affecting a substantial number of people, and this impact would be *less than significant*. As a similar amount of residential development would occur, potential impacts would be comparable to the proposed project.

6.4.6.15 Public Services

Development under this alternative could increase the demand for police and fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable response times, fire flows, and service ratios (Impacts 4.15-1 and 4.15-2). Under this alternative, the same amount of development requiring police and fire protection services would be constructed as under the proposed project. In addition, the Santa Barbara County Fire Department's existing average response time of less than five minutes to the alternative sites would not change with Station 11 serving as first response unit to the property near the Sandpiper Golf Course and Station 13 serving as first response unit to the St. Vincent's property. The UCPD could serve the project sites. Alternatively, the UCPD could enter into an agreement with the Santa Barbara County Sheriff's Department (SBCSD), which serves the Cities of Goleta and Santa Barbara, for police protection services of the alternative sites, and mitigation would be required to ensure that an agreement is entered into by the UCPD and the SBCFD. Implementation of MM 4.15-2(a) and

(b) would also ensure that impacts to police protection would be mitigated to a *less-than-significant* level by providing for an ongoing assessment of police staffing levels and equipment needs and by requiring that minimum lighting standards for safety be provided. MM 4.15-1 would ensure that impacts to fire protection services remain *less than significant* by facilitating emergency response, which has historically allowed the SBCFD to provide acceptable response times. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

Development under this alternative would increase enrollment in local schools (Impacts 4.15-3). Under this alternative, the same amount of development generating school-aged children would be constructed as under the proposed project. An increase in enrollment at all three school levels would occur due to development within the St. Vincent's property of the City of Goleta and the property near the Sandpiper Golf Course of the City of Santa Barbara resulting in more residents and, consequently, more school-aged children. The additional students generated by this alternative would not result in overcapacity issues within the SBHSD or GUSD schools serving the site; however, the payment of school impact fees is usually required of a project that results in more school-aged children entering into the local school district(s). Campus development projects are exempt from payment of school impact fees to local school districts, but the school districts have a variety of options available to respond to the issue of University projects contributing more students to them. Therefore, since building a new school is only one of several options available for addressing the contribution of more school-aged children to the local school districts, this impact would be *less than significant*. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

Development under this alternative would result in residential development that would generate an additional demand for water; however, this alternative would not require the construction of new or expanded water treatment facilities nor would it require water supplies in excess of existing entitlements and resources or result in the need for new or expanded entitlements (Impacts 4.15-4 and 4.15-6). Under this alternative, the same amount of development requiring water supplies would be constructed as under the proposed project. MM 4.15-4 would require that the campus maintains and ensures provision of adequate water treatment facilities, water mains, and reclaimed water distribution systems in order to meet campus needs, which would include this alternative. In addition, MM 4.15-6(a) through 4.15-6(d) would ensure appropriate implementation of water conservation measures. Therefore, this alternative would not require new or expanded water entitlements and resources, and these impacts would be *less than significant*. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

Development under this alternative would result an in increased amount of impervious surfaces; however, this alternative would not require the construction of new storm water drainage facilities (Impact 4.15-5). Under this alternative, 0.3 more acres of impervious surfaces would result as compared to the proposed project. The University would implement MM 4.15-4(a) and (b), to require an assessment of the alternative's impact on downstream storm drain facilities and

measures to reduce discharge or improve downstream facilities as appropriate. With implementation of MM 4.15-4(a) and (b), this impact would be reduced to a *less-than-significant* level. As the same amount residential development but slightly more acres of impervious surfaces would occur under this alternative, potential impacts would be greater than under the proposed project.

Development under this alternative would result in residential development that would generate additional solid waste, and increased solid waste generation would contribute to use of the remaining capacity of the Tajiguas Landfill; however, this alternative would not require the expansion of the permitted capacity of the Tajiguas Landfill and would comply with all applicable federal, state, and local statutes and regulations related to solid waste (Impacts 4.15-7 and 4.15-8). With a proposed population of 1,003 (due to development of the same number of units as under the proposed project) and a remaining 16-year life at the Tajiguas Landfill, the landfill would adequately serve the solid waste generation of proposed residents of this alternative. MM 4.15-7 would require the University to continue to implement applicable solid waste reduction and recycling programs. This would ensure a limit on the total quantity of solid waste that is disposed of in landfills and would ensure compliance with State-mandated solid waste reduction efforts. With implementation of relevant mitigation, these impacts would be *less than significant*. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

Development under this alternative could require the construction of new or expanded wastewater conveyance systems (e.g., trunk lines); however, this alternative would not exceed wastewater treatment requirements of the RWQCB nor require expansion of wastewater treatment facilities (Impacts 4.15-9, 4.15-10, and 4.15-11). Under this alternative, the same amount of development generating wastewater would be constructed as under the proposed project. MM 4.15-4 requires that the University continue to maintain and ensure provision of adequate wastewater conveyance systems and treatment facilities in order to meet University needs for faculty and student housing developments. In addition, MM 4.15-6(a) through (d) would require application of water consumption measures, which would, in turn, reduce wastewater flows. The University would also comply with the applicable requirements of the Central Coast RWQCB. Finally, MM 4.15-11 would ensure that development would not result in limiting the GWSD's ability to serve their service area. Therefore, implementation of this alternative would not require new or expanded wastewater treatment facilities, generate wastewater that would exceed the capacity of the Goleta Sanitary District's Wastewater Treatment Plant in combination with the provider's existing service commitments, nor exceed wastewater treatment requirements of the RWQCB, and these impacts would be *less than significant*. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

Development under this alternative would result in residential development that would increase the demand for electricity and natural gas; however, this alternative would not require or result in the construction of new energy production or transmission facilities nor result in the inefficient use of energy (Impacts 4.15-12. 4.15-13. and 4.15-14). Under this alternative, the same

amount of development requiring electricity and natural gas supplies would be constructed as under the proposed project. This alternative would comply with the conservation requirements of Title 24 of the California Code of Regulations (CCR). In addition, MM 4.15-12(a) and 4.15-12(b) would ensure adherence to future University conservation goals or programs as well as implementation of University energy conservation measures to reduce the demand for electricity and natural gas. Thus, this alternative would not require or result in the construction of new energy production or transmission facilities or the inefficient use of energy, and these impacts would be *less than significant*. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

6.4.6.16 Population and Housing

Development of 387 housing units on approximately 46 acres of land within the alternative sites would not directly induce substantial population growth in the area by providing additional housing for faculty and student families (Impact 4.16-1). An increase in housing of 387 units, representing a potential increase of 1,003 residents (under this alternative) would not represent a substantial increase in housing supply, and, therefore, would not induce substantial population growth in the area, relative to the overall population of the area and this impact would be *less than significant*. As the same amount of residential development would occur under this alternative, potential impacts would be comparable to the proposed project.

6.4.6.17 Relationship to Project Objectives

The Off-Site Alternative would meet the following the project objectives:

- Provide a variety of additional University-owned faculty housing to meet long-term demand for affordable faculty housing and thereby enable the University to recruit and retain a superior quality of and diverse faculty.
- Provide additional University-owned family-student housing to meet demand for affordable family student housing, and enable the retention of a broad selection of qualified students.
- Provide on-campus housing to support closer linkages between residential and academic functions and reduce the number and length of vehicle trips associated with commuting.
- Create attractive new residential neighborhoods for faculty and their families and student families that are compatible with existing adjacent residential uses.
- Provide a mix of townhome, duplex, studio, and detached single-family homes for faculty, to respond to demand for varied housing types.
- Implement restoration opportunities and physical improvements identified in the Coal Oil Point Natural Reserve Management Plan.

The Off-Site Alternative would not or would only partially meet the following the project objectives

- Integrate the proposed family-student housing with the existing West Campus Family Student Apartments Family Student Housing to enhance the existing facilities and create a shared sense of community.
- Maximize the ability of the North Campus to meet identified campus housing needs.
- Develop much-needed housing in such a manner as to preserve and protect the natural setting of the Coal Oil Point Reserve and other sensitive coastal resources.
- Implement proposed project components of the Joint Proposal and Open Space Plan within the University's jurisdiction and thereby provide an open space, habitat, and development plan that is, on balance, most protective overall of sensitive natural and coastal resources and assures improved public coastal access and the preservation and enhancement of 652 contiguous acres of open space, natural reserve, and marine environment resources.
- Protect, enhance, and restore key natural, cultural, and scenic resources using an integrated ecosystems approach.
- Provide for improved public access and compatible passive recreation, consistent with the conservation of significant coastal resources.
- Protect Devereux Creek, Devereux Slough and the adjacent upland and marine habitats.
- Preserve and protect and restore identified sensitive habitat areas, including wetland, native grassland, dune, back dune, and freshwater pond habitat.
- Provide residential and open space land uses that are consistent, to the extent feasible, with the California Coastal Act policies, and with the prior development plans and expectations for the West Devereux property (now the University's North Campus) that was set forth for this area through standards in the Santa Barbara County Local Coastal Plan.

This off-site alternative is considered to representative of the potential benefits and impacts of shifting presently proposed development from the North and West Campus. As a general matter, shifting development avoids the immediately foreseeable impacts of developing on the North and West Campus. Sensitive resources on the North and West Campus would not be impacted by the presently proposed project. Other development impacts (such as traffic impacts, and other local development impacts) would be shifted from one location to another, but would not necessarily be entirely avoided. Over the long term, demand for additional student and faculty housing would still remain, and it is likely that the North and West Campuses would be utilized to meet such needs. Therefore, the potential impacts to sensitive resources on such parcels would merely be deferred, not permanently avoided. By contrast, by implementing the Joint Plan, the proposed project would achieve the balance of protection of sensitive coastal resources that is most beneficial, and 652 acres of contiguous open space would be preserved.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. This would ideally be the alternative that results in fewer (or no) significant and unavoidable impacts. CEQA Guidelines Section 15126(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. The proposed project would result in significant and unavoidable impacts to air quality (operational mobile source emissions) and noise (during construction) and would contribute to significant and unavoidable cumulative impacts to water quality (resulting from urban contaminants in stormwater). Thus, for the purposes of this analysis, the alternative or alternatives that reduce or avoid operational air emissions, construction noise, or contributions to urban contaminants in stormwater would be environmentally superior to the proposed project.

For this project, the No Project alternative (Alternative 2) would reduce or avoid all project impacts; however, none of the project objectives would be achieved.

The South Parcel Alternative (Alternative 1), would result in significant and unavoidable impacts from construction noise and operational emissions, however these impacts would both be less than the proposed project. However, this alternative would also result in significant and unavoidable impacts associated with exposure to potential health risks in the event of an accident or accidental release from the EMT, degradation of the visual character or quality of the North Campus, and loss of existing recreational opportunities. Because fewer residential units would be constructed, the project's contribution to potential cumulative water quality impacts would be reduced compared to the proposed project. However, because this alternative would not result in the implementation of the Open Space Plan and would no implement the habitat preservation and restoration concepts articulated in the Joint Proposal, potential cumulative impacts to biological resources would be significant and unavoidable. Thus, Alternative 1 would reduce the construction noise and operational air emissions associated with the proposed project, but would result in other *significant and unavoidable* impacts. Alternative 1 would not be environmentally superior to the proposed project, but would be environmentally superior to the other alternatives identified.

Implementation of the Existing LRDP (Alternative 3) would result in significant and unavoidable impacts from construction noise and operational emissions, and these impacts would both be greater than the proposed project. Alternative 3 would also result in significant and unavoidable impacts associated with exposure to potential health risks in the event of an accident or accidental release from the EMT, degradation of the visual character or quality of the North Campus, and loss of existing recreational opportunities. In addition, because this alternative would not result in the implementation of the Open Space Plan and would be inconsistent with concepts articulated in the Joint Proposal, cumulative impacts to biological resources would be significant and unavoidable, greater than the proposed project. Thus, Alternative 3 would not reduce the construction noise and operational air emissions associated

with the proposed project, would result in other significant and unavoidable impacts, and would not be environmentally superior to the proposed project.

Implementation of Maximum Housing Development (Alternative 4) would result in significant and unavoidable impacts from construction noise and operational emissions, and these impacts would both be greater than the proposed project. Alternative 4 would also result in significant and unavoidable impacts associated with exposure to potential health risks in the event of an accident or accidental release from the EMT, degradation of the visual character or quality of the North Campus, and loss of existing recreational opportunities. In addition, because this alternative would not result in the implementation of the Open Space Plan and would be inconsistent with concepts articulated in the Joint Proposal, cumulative impacts to biological resources would be significant and unavoidable, greater than the proposed project. Thus, Alternative 4 would not reduce the construction noise and operational air emissions associated with the proposed project, would result in other significant and unavoidable impacts, and would not be environmentally superior to the proposed project.

The Off-Site Alternative (Alternative 5) would avoid the significant and unavoidable impacts associated with short-term construction noise impacts, however, this alternative would result in significant and unavoidable impacts from operational air emissions that would be greater than the proposed project, as a result of the increased commute distance to the campus. Alternative 5 would result in the conversion of a larger undeveloped area than the project, as well as potential impacts to candidate, sensitive, special-status plant and wildlife species, special status habitats including wetlands, riparian habitats and their channels (on the St. Vincent's site), native grasslands, and Venturan coastal sage scrub. Alternative 5 would also result in significant and unavoidable impacts associated with degradation of the visual character or quality of the development sites and the surrounding area. Improvements called for by the open space plan and the project's contribution towards permanent preservation and restoration of 652 acres of consolidated open space would not occur. Thus, the Off-Site Alternative would not be environmentally superior to the proposed project.

6.6 COMPARISON OF THE EFFECTS OF THE ALTERNATIVES

Table 6-18 (Comparison of Alternatives to the Proposed Project) provides (in a summarized format) a comparison of post-mitigation project impacts with those of each alternative, assuming that feasible mitigation measures are also implemented for each alternative. This table presents the level of significance for each project alternative, by issue area, as compared to the impacts of the proposed project.

Table 6-18.
Comparison of Environmental Effects of the Alternatives

Resource	Alternative 1: South Parcel Development	Alternative 2: No Project, No Development	Alternative 3: Existing LRDP	Alternative 4: Maximum Housing Development	Alternative 5: Off-Site Alternative
4.2 Geology and Soils	LS (G)	NI (L)	LS (G)	LS (G)	LS (E)
4.3 Hydrology	LS (G)	NI (L)	LS (G)	LS (G)	LS (E)
4.4 Biological Resources	LS (G)	NI (L)	LS (G)	LS (G)	LS (G)
4.5 Hazards & Hazardous Materials	SU (G)	NI (L)	SU (G)	SU (G)	LS (L)
4.6 Land Use	LS (L)	NI (E)	LS (E)	LS (E)	LS (L)
4.7 Agricultural Resources	NI (E)	NI (E)	NI (E)	NI (E)	NI (E)
4.8 Mineral Resources	LS (E)	NI (L)	LS (E)	LS (E)	LS (E)
4.9 Visual Resources	SU (G)	NI (L)	SU (G)	SU (G)	SU (E)
4.10 Recreation	SU (G)	NI (L)	SU (G)	SU (G)	LS (E)
4.11 Cultural Resources	LS (E)	NI (L)	LS (G)	LS (G)	LS (G)
4.12 Traffic and Transportation	SU (L)	NI (L)	SU (G)	SU (G)	LS (L)
4.13 Noise	SU (L)	NI (L)	SU (G)	SU (G)	LS (L)
4.14 Air Quality	SU (L)	NI (L)	SU (G)	SU (G)	SU (G)
4.15 Public Services	LS (L)	NI (L)	LS (G)	LS (G)	LS (E)
4.16 Population and Housing	LS (L)	NI (L)	LS (G)	LS (G)	LS (E)

NI = No Impact
LS = Less Than Significant
SU = Significant and Unavoidable

(L) = Impact would be Less than the Proposed Project
(E) = Impact would be Comparable to the Proposed Project
(L) = Impact would be Greater than the Proposed Project

6.7 REFERENCES

County of Santa Barbara. 2001. Supplemental Environmental Impact Report for the "Residences at Sandpiper." SCH#1993121097

County of Santa Barbara, City of Goleta and University of California, Santa Barbara. 2002. Joint Proposal for the Ellwood-Devereux Coast. March

University of California, Santa Barbara. 1998. North and West Campus Housing LRDP Amendment Final EIR. Prepared by Wallace Roberts & Todd.